

06-09-94



Science Applications International Corporation
An Employee-Owned Company

DCN: RZ3-SAI-R09005-03-IS-00315

**RCRA COMPLIANCE EVALUATION
INSPECTION REPORT
FOR
ROLLINS OPC INC.
5756 ALBA STREET
LOS ANGELES, CA 90058**

OCTOBER 1994

Submitted to:

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFORNIA 94105**

Submitted by:

**SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
20 CALIFORNIA STREET, SUITE 400
SAN FRANCISCO, CALIFORNIA 94111**

**EPA CONTRACT NO. 68-W4-0005
EPA WORK ASSIGNMENT NO. R09005
SAIC PROJECT NO. 05-5025-03-8162**

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

**HAZARDOUS WASTE MANAGEMENT DIVISION
WASTE COMPLIANCE BRANCH**

Facility: Rollins OPC Inc.
5756 Alba Street
Los Angeles, CA 90058

EPA ID Number: CAD050806850

Date of Inspection: June 9, 1994

Inspectors: Scott Kinderwater
Science Applications International Corporation
20 California Street, Suite 400
San Francisco, CA 94111
(415) 399-0140

Facility Representatives: Desmond Phillip
Wilfred Ndubizu
Chris Lilley
(213) 585-5063

Report Prepared By: Scott Kinderwater

Report Date: July 21, 1994
Revised Report Date: October 10, 1994

POTENTIAL VIOLATION

The following potential violations were discovered during the June 9, 1994 CEI.

1. RCRA Permit, Part III of the permit, General Facility Conditions, Item J. Manifest System

Item J. requires that the Permittee shall comply with the manifest requirements of 40 CFR §264.72 Manifest discrepancies. The facility sign off copy of Uniform Hazardous Waste Manifest No. 93130038 was not attached to the manifest filed in the facility's March 1994 manifest file. See Attachment 8. Pursuant to §264.72, the facility had not submitted to the Regional Administrator a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest at issue.

2. RCRA Permit, Part III of the permit, General Facility Conditions, Item F. Personnel Training

Item F. requires that the Permittee shall conduct personnel training, as required by 40 CFR §264.16. Subsection 264.16(d)(3) allows the facility to define the training requirements per position by "a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section." Subsection 264.16(a)(3) requires "at a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems..." Jose Aguilar has not received emergency/contingency plan/evacuation procedures training since July 27, 1990, and other than Dept 250/260 training, there is no indication that he has received any job position training since that time. The Rollins OPC Operating Procedures Manual states that specific operations training is required for all tasks, such as sampling, waste receiving, repacking, however there was no documentation in the training file for Jose Aguilar that he had received this task-specific training.



Science Applications International Corporation
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October 10, 1994

DCN: RZ3-SAI-R09005-03-IS-00315

Ms. Jean Daniel (H-4-3)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94111

Re: EPA Contract No. 68-W4-0005; EPA Work Assignment No. R09005
SAIC Project No. 05-5025-03-8162
Rollins OPC - CEI Final Report

Dear Ms. Daniel:

Enclosed you will find the final report for the CEI conducted by Scott Kinderwater of this office at Rollins OPC on June 9, 1994. Based on our conversation of September 29, 1994, we have included a second potential violation, failure to provide training to ensure that facility personnel are able to respond effectively to emergencies, in this report.

We are sending you loose pages that were changed for you to insert into the final report. Please call if you have further questions. I can be reached at (415) 399-0140.

Sincerely,
SCIENCE APPLICATIONS INTERNATIONAL CORPORATION

A handwritten signature in black ink, appearing to read "Su Corbaley", is written over the typed name.

Su Corbaley
Work Assignment Manager

cc: Jacqueline Settles, SAIC Document Control Officer



July 27, 1994

DCN: RZ3-SAI-R09005-03-IS-00057

Ms. Diane Bodine (H-4-3)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94111

Re: EPA Contract No. 68-W4-0005; EPA Work Assignment No. R09005
SAIC Project No. 05-5025-03-8162
Rollins OPC - CEI Report

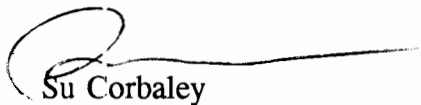
Dear Ms. Bodine:

Enclosed you will find the report for the CEI conducted by Scott Kinderwater of this office at Rollins OPC on June 9, 1994. Submittal of the draft report was delayed in order to receive a copy of the waste minimization plan from the facility.

The inspection went well and no problems were encountered. Eight hours were sufficient to complete the CEI. Two potential violations were noted. First, the facility failed to notify the Regional Administrator of its attempts to locate the generator copy of a manifest for waste shipped by Rollins OPC, and second, the facility failed to document that an employee had received updated training specific to his job. All violations noted in previous inspections have been reconciled. Rollins OPC is a very well run and well maintained facility.

SAIC looks forward to receiving your comments. Do not hesitate to contact Mr. Kinderwater or myself if you have any questions regarding this report. We can be reached at (415) 399-0140.

Sincerely,
SCIENCE APPLICATIONS INTERNATIONAL CORPORATION



Su Corbaley
Work Assignment Manager
Software and Systems Development Division
Environmental and Health Sciences Group

cc: Jacqueline Settles, SAIC Document Control Officer

**RCRA COMPLIANCE EVALUATION
INSPECTION REPORT
FOR
ROLLINS OPC INC.
5756 ALBA STREET
LOS ANGELES, CA 90058**

JUNE 1994

Submitted to:

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFORNIA 94105**

Submitted by:

**SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
20 CALIFORNIA STREET, SUITE 400
SAN FRANCISCO, CALIFORNIA 94111**

**EPA CONTRACT NO. 68-W4-0005
EPA WORK ASSIGNMENT NO. R09005
SAIC PROJECT NO. 05-5025-03-8162**

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

**U.S. ENVIRONMENTAL PROTECTION AGENCY
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**HAZARDOUS WASTE MANAGEMENT DIVISION
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Report Prepared By: Scott Kinderwater

Report Date: July 21, 1994

INTRODUCTION

On June 9, 199⁴~~3~~, under Contract No. 68-W4-0005 with the U.S. Environmental Protection Agency, Mr. Scott Kinderwater, representing Science Applications International Corporation (SAIC), conducted an unannounced Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) at the Rollins OPC (formerly Oil Process Company, or OPC) Inc. facility located at 5756 Alba Street in Los Angeles, California (EPA Identification No. CAD050806850). The facility is currently operating under a U.S. EPA Part B permit, issued July 18, 1990. The purpose of the inspection was to evaluate the facility's compliance with the federal Part B permit and RCRA Hazardous Waste Regulations. The state of California issued a permit to the facility May 29, 1990; the facility was also evaluated under California Hazardous Waste Regulations, as outlined in Title 22, California Code of Regulations (CCR). Photographs were taken to document the inspection and are included as Attachment 1 of this CEI report. The RCRA CEI checklist for generators is included as Attachment 2. A list of documents referenced in preparation for the inspection and this report can be found in Attachment 3.

In preparation for this CEI, the previous CEI report for the January 11, 1994 EPA inspection and the July 18, 1990 permit were reviewed. A partial review of the California Department of Toxic Substances Control (DTSC) files was performed due to scheduling constraints to complete this inspection. However, and to supplement the file review, the DTSC Region 3 office was contacted, and Andy Bajwa (DTSC permit writer) and Roy Yeoman (compliance and surveillance supervisor) were interviewed on June 8, 1994. Mr. Bajwa stated there were no outstanding permitting issues other than a Class II permit modification. Mr. Yeoman stated there were no outstanding compliance issues and that Region 3 had not conducted a CEI since December 1992. The DTSC inspector who conducted the last inspection, Guillermo Hernandez, confirmed during a subsequent telephone interview that there were no outstanding compliance issues.

The CEI was unannounced and was completed within one day. A cyclone fence stops all traffic at the entrance to the facility. A guard greets visitors and incoming shipments, and notifies the office of arrivals. Messrs. Wilfred Ndubuizu, Desmond Phillip, and Chris Lilley were contacted and an in-depth discussion was held to determine the status of the operating units at the facility. Rollins OPC Inc. (Rollins OPC), a wholly owned subsidiary of Rollins Environmental Services, operates a hazardous waste treatment and storage facility. The Rollins OPC waste management facility receives, stores, blends, treats and transfers select combustible liquid wastes and sludges.

PERMIT STATUS

The original Part A Permit Application for the facility was submitted by Oil Process Company (OPC) to the California Department of Health Services (DHS) on August 6, 1980, and the facility was granted interim status to operate.

On June 3, 1985, OPC was issued a RCRA-equivalent Hazardous Waste Facility Permit (HWFP) by DHS, which expired on June 3, 1990. OPC submitted a revised Part B Permit Application on March 30, 1989. The DHS and EPA issued a revised RCRA HWFP on May 29, 1990, and July 18, 1990 respectively, to allow Oil Process to continue operating a storage, treatment, and transfer facility, to close the existing drum storage/treatment tanks, and to add new tanks, a railcar storage area, and a new drum storage area. The EPA permit became effective on August 27, 1990 and expires on August 27, 1995. Rollins OPC submitted an updated Part A Application on October 14, 1992 to reflect a name change of the facility from Oil Process Company to Rollins OPC Inc. Rollins OPC submitted an updated Part A Application on February 14, 1994 to reflect their request for additional waste codes. Concurrently, Rollins OPC submitted a Class II permit modification to allow for the management of newly listed RCRA waste codes and for the reconfiguration of their permitted storage units. According to Wilfred Ndubuizu, the public notice and review period has expired, a public meeting was held in March 1994, and Rollins OPC is currently awaiting DTSC's completion of CEQA requirements. Rollins OPC has responded to DTSC's permitting questions relevant to the CEQA document and is aware that once the CEQA document has been published there will be a 30-day waiting period. As of the date of the CEI, DTSC permitting had not completed the CEQA document. One element of the Class II permit modification is a decision by Rollins OPC to process household waste aerosol cans. Rollins OPC already processes household waste. Currently, household aerosol cans are directed to a landfill. The approval of the Class II permit modification would allow Rollins OPC to segregate the aerosol cans for incineration thereby minimizing waste destined for landfilling and reducing the impact of aerosol containers on a landfill. The Class II permit modification cover letter and updated Part A Application are included as Attachment 4.

On August 31, 1990, Oil Process' hazardous waste hauler's registration expired. Rollins OPC currently uses Custom Environmental Transport (CET) or Matlack, Inc., both wholly owned subsidiaries of Rollins Environmental Services, for their transportation needs.

There are no Interim Status units at Rollins OPC.

SUMMARY OF PREVIOUS COMPLIANCE EVALUATION INSPECTIONS

Following is a listing of the violations cited in the two most recent CEIs.

On June 18, 1993, SAIC/TSC, representing EPA, conducted a CEI at Rollins OPC and evaluated them for compliance with their RCRA HWFP. One potential violation was observed during that CEI. Pursuant to the Duties and Requirements section of the permit, Rollins OPC failed to specify the analytical techniques or methods used on drum sample internal laboratory reports. OPC contested this potential violation and noted that the permit only requires that the methods be specified, not when and where. The facility explained that the methods are specified in the facility's waste analysis plan.

Rollins OPC has implemented specifying analysis technique/method used on all laboratory analysis records. EPA initiated no enforcement.

On January 11, 1994, EPA conducted a CEI at Rollins OPC. Three potential violations were noted in the inspection report. Title 22 of the California Code of Regulations was referenced.

66264.173(b) Rollins OPC handled a container in a manner which may cause it to rupture or leak.

66262.34(f)(3) Rollins OPC failed to label containers of HW with the correct composition and physical state of the HW and its hazardous properties.

66264.15(b)(3) Inspection schedule failed to identify appropriate problems to be looked for.

According to the EPA inspection report, Rollins OPC has returned to compliance with these requirements.

INVESTIGATION

An opening meeting was held in the Rollins OPC main office. Wilfred Ndubuizu, Environmental Affairs Manager, Desmond Phillip, Process Manager, and Chris Lilley, Technical Manager represented Rollins OPC. Batch treatment of wastewater and the status of new construction was discussed. All three Rollins OPC representatives participated in the site inspection.

Rollins OPC currently operates as a drum storage facility, wastewater treatment facility, and container repackaging facility. In addition, they operate as a transfer facility for CHEMPAK, Inc., a lab-packaging division of Rollins Environmental Services.

Batch treatment of wastewater consists of oxidation for cyanide wastewater, reduction of hexavalent chrome wastewater, and solidification and neutralization of wastewater containing heavy metals. The eventual disposal mechanism is to the sanitary sewer. Residues generated from the treatment activities (consisting of filter cake and spent activated carbon) are collected in roll-off bins and disposed of offsite.

The container repackaging operations consist of bulking incoming wastes into homogenous waste streams for offsite disposal at one of the hazardous waste incinerators operated by Rollins Environmental Services in Deer Park, Texas or Baton Rouge, Louisiana. Residues remaining from the bulking and repackaging operations consist of empty drums (California regulated hazardous waste). Since 1993, Rollins OPC has been segregating most drums for reconditioning by Ted Levine located in South El Monte, California and Mesa, Arizona. Approximately 25 percent of the drums are not recyclable. They are crushed, collected in roll-off bins and disposed of in the landfill at Chemical Waste Management in Kettleman City, California.

Several modifications are being implemented to upgrade the Rollins OPC facility. No modifications to the 1990 permit are necessary because the new construction was included in the permit. An interim site plan is shown in Attachment 5. Rollins OPC is continuing to operate during the construction.

A 16,000 square-foot drum warehouse and drum processing building is being built to be used for lab pack and drum processing. The previous drum storage pad and roll-off containing storage unit received closure certification from DTSC on September 29, 1992. While the storage and process building is being completed, Rollins OPC is operating a permitted temporary drum storage area. This unit was in operation at the time of the CEI; however, drums are also being stored in the new drum warehouse. Rollins OPC intends on moving into the new drum processing building by July 1994. The first operations will be drum receiving, drum sampling and lab packing. Rollins OPC plans to begin construction of the new wastewater treatment system in the near future. This system will be located in the northeast corner of the facility. The existing wastewater treatment system was operable at the time of this inspection. A railcar transfer station is being constructed with a scheduled completion date of September 1994.

EPA Region IX is notified of all new construction progress and changes via quarterly "Permit Maintenance Reports" prepared under the supervision of the DTSC Facilities Management Branch Unit Chief (Maxine Richey).

Mr. Ndubuizu stated that there were no incidences, releases or catastrophic events during 1993 or 1994 that required twenty-four hour reporting. He further stated that the facility is not operating under any corrective action since there have been no reportable releases. There have been no incidences that required the implementation of the contingency plan.

Waste Acceptance

Prior to unloading, all containers of waste are assigned an internal identification number called the Rollins OPC unique identifier number. The unique identifier number allows tracking of individual wastes as they proceed through the facility.

To confirm that incoming waste matches the profile supplied to Rollins OPC by the generator, a technician draws a sample from each drum and each tank truck load. Waste is accepted based on the analysis of this fingerprint sample. Analyses routinely performed are metals, pH, ammonia, cyanide, hydrocarbons, and fuel value (BTU). Analyses selected are determined by knowledge of the generator's profile. If the fingerprint sample does not match the profile of the hazardous waste, Rollins OPC will reject the waste or will contact the generator for permission to correct the discrepancy at the generator's expense.

Drums of waste are off-loaded in front of the Temporary Drum Storage Pad. Waste is off-loaded from tank trucks parked inside the facility directly to the east of the guard shack. Off-loading trucks are connected to a vapor return line. The vapor return line connects to a carbon recovery unit which is part of the air pollution control system.

Applicability to Air Emission Standards for Process Vents

The facility has two active systems to collect emissions venting from the water treatment and process areas. The thermal oxidizer system shown in Photo No. 1 is a closed vent system. The other system (carbon bed V-4) collects emissions from the filter press area, the truck washout and fugitive emissions from off-loading tank trucks. Rollins OPC considers both systems to be air pollution control systems not process vents. More specifically, Rollins OPC does not consider either system to be associated with distillation, fractionation, thin-film evaporation,

solvent extraction or air/steam stripping operations. Consequently, Rollins OPC and, reportedly, EPA (during the CEI conducted on January 11, 1994) do not find the systems subject to the requirements of 265 Subpart AA, Air Emission Standards for Process Vents.

The facility has started testing a third air pollution control system which will vent the new drum processing area and the drum warehouse. Emissions will be collected and vented to the catalytic thermal oxidizer shown in Photo No. 2. This is a closed vent system. The sampling room will be the first unit scheduled to be vented to the catalytic thermal oxidizer. As more units (i.e. the stinging room, the drum warehouse) are vented to this system, a determination will need to be made as to this system's applicability to the requirements of 265 Subpart AA, Air Emission Standards for Process Vents. Until such determination, the facility will not implement all the standards set forth in this regulation.

In their inspection report for the CEI conducted on January 11, 1994, EPA recommended that subsequent inspectors verify Rollins OPC's compliance with the requirements of 265 Subpart AA, Air Emission Standards for Process Vents and BB, Equipment Leaks, upon startup of the new wastewater treatment system due to planned treatment of hazardous wastes with organic concentrations of at least 10 ppmw. Construction has not begun on the new wastewater treatment system.

Wilfred Ndubuizu stated on June 14, 1994 that Rollins OPC does not comply with all of the requirements of 265 Subpart AA, Air Emission Standards for Process Vents.

Water Treatment

According to Desmond Phillip, the existing water treatment system consists of 12 tanks, a filter press, an activated carbon absorption unit, and a caustic scrubber. Attachment 6 is a system diagram of the wastewater treatment unit. A water layer is maintained in each tank to keep monitoring probes wet. Prior to any treatment, the water in the tank is analyzed by the onsite laboratory. A sample is pulled from the drums of waste and a compatibility test is run. Secondary containment of liquids in the tanks is furnished by a 12-inch-high berm which completely encircles the perimeter of the water treatment plant. Secondary containment for the entire tank process area is 100 percent capacity of the largest tank, Tank V9, which has a capacity of 100,000 gallons. All rainwater that falls inside the plant is collected and pumped to Tank V9 for treatment. Tank V9 previously treated oily wastewater; currently, V9 only treats rainwater.

Tank V-1, the acid treatment tank, was inspected (Photo No. 3). Besides acid neutralization, this 10,000-gallon capacity tank is also used to treat hexavalent chrome by reduction. No treatment was occurring in Tank V-1 the day of the inspection.

Tank V-2, a 10,000-gallon tank is used for the treatment (neutralization) of caustic waste (Photo No. 4). Cyanide destruction also occurs in this tank. Calcium hypochlorite is used as the oxidation agent for cyanide destruction and sodium hydroxide is used for pH control. The laboratory determines free cyanide concentration by distillation during analysis.

Rollins OPC employs a batch system for wastewater treatment as compared to a continuous system. In a batch system, all waste pumped into the system is neutralized prior to the initiation of a new batch.

The maximum allowable volume of wastewater treated at Rollins OPC is 380,000 gallons. Rollins OPC discharged 24,684 gallons to the Los Angeles sewer system in May 1994. This volume is roughly equivalent to the volume of wastewater treated in May 1994. (See Attachment 7)

The blue tank shown in Photo No. 5 is the final polishing activated carbon tank V-5 AB. The treated wastewater polished in this tank goes to storage tank V-5 where it is sampled to determine whether it meets sanitary sewer discharge limitations. The spent carbon from V-5 AB is burned as hazardous waste at Rollins Environmental incinerators in either Texas or Louisiana.

The acid gas scrubber exhaust pipe is the blue pipe shown in Photo No. 6. The scrubber is also known as the caustic scrubber. The exhaust pipe is noticeably corroded. The thermal oxidizer exhaust pipe is the white pipe shown on the right. An induced draft fan adds atmospheric air to cool the exhaust prior to discharge. This exhaust pipe and the elbow below the pipe were observed to be oxidized. Immediately to the left of the elbow of the thermal oxidizer exhaust pipe (Photo No. 7) is a .5-inch sampling port. It is visible as a shut-off valve. Air samples can be collected at this port.

Mr. Jesus Vela, operation technician, described the daily tank inspection routine. Each tank is visually checked for corrosion and leaks. All fittings, pipes and valves are visually checked. Observations are recorded in a log. Tank levels are checked by comparison to a gauge with floats. An audio high-level alarm ensures that tanks will not be overfilled.

Temporary Drum Storage Area and Drum Staging Area

Drums are segregated by hazard class into eight bays. Each bay is separated by a 6-inch-high concrete berm (no photograph taken). No open drums were observed.

A repacked 30-gallon drum of Rollins OPC generated waste temporarily stored in the drum staging area was inspected. The hazardous waste label is shown in Photo No. 8. The repacked process date is 6/9/94. To confirm Rollins OPC ability to track any waste back in time, the inspector requested all documentation pertaining to Doc. No. 01042. This number is printed on the drum. (The corresponding tracking number OPC 110351-94 is also printed on the drum but not visible in the photograph. This number is used for piece count verification.) Corresponding documents were collected by Rollins OPC and presented to the inspector. The repacked drum contained incoming waste generated by Rohm and Haas, manifest No. 93180437 and by Reynolds Electrical and Engineering Company, manifest No. 93180624. Rollins OPC unique ID numbers assigned to the incoming waste allow for tracking through processing. By this procedure, the inspector was able to confirm that Rollins OPC can track a waste from acceptance into the facility until ultimate manifesting offsite. In this case, the outgoing manifest for Doc. No. 01042 (the 30-gallon drum) had not yet been prepared. Rollins OPC will include Doc. No. 01042 on the outgoing manifest to complete the paper trail.

Photo No. 9 shows empty drums which will not be reconditioned. These drums will be land disposed. The hazardous waste labels remain on the drums to identify the last contained substance. Photo No. 10 shows empty drums inside a panel truck which will be sent for reconditioning. Both steel drums and polyethylene drums are shown.

During this CEI conducted by SAIC, problems and potential violations identified during the EPA inspection of Rollins OPC were further evaluated during the walk-through portion of the inspection. EPA inspectors noted that several of the wooden pallets being used under the drums were in poor condition and therefore made storage of the drums above them very unstable, particularly during transport via forklift. This, coupled with the fact that the storage area has berms which make the ground uneven, created a situation where drums which were stacked two high and leaning next to adjacent drums nearly toppled over when workers attempted to remove the adjacent drums. This situation was discussed with OPC managers during the outbriefing by EPA on January 11, 1994, and it was decided to replace pallets in bad condition and shrink wrap all drums while in storage to insure against accidental toppling. Photograph No. 11, taken at 12:17 p.m., shows the container processing and container storage area. Shrink-wrapped drums

are visible. According to Desmond Phillip, the late morning is the busiest time for accepting incoming loads, sampling and processing. The foreground shows the staging area which was judged by SAIC to be crowded. The area was kept clean and no spills or container leaks were observed. It is recommended that the new drum storage and processing area be inspected for crowded conditions during subsequent CEIs.

Roll-off Bins

Four roll-off bins were stored at the facility during the inspection. All roll-off bins were covered. The roll-off bin shown in Photo No. 12 (nearer the door) contained waste rags and debris. The generator listed on the hazardous waste label was NAS Lemmore. No roll-off bins were mislabeled as noted during the previous CEI and no violations were observed.

New Drum Processing Area and Drum Warehouse

The new drum processing area is not yet operable. It will be totally enclosed. The outside of this area is shown in Photo No. 12. Photo No. 13 shows the stinging (pumping) room which will be used for aspirating drum liquids into bulk tanks for treatment. The drums will move via conveyor rollers. All work stations will be vented via exhaust blowers. Photo No. 2 shows the catalytic thermal oxidizer which will receive inorganic and organic emissions vented from the new drum process area. As such, it is a pollution control device as compared to a waste disposal unit.

The new drum warehouse was inspected. Aisle space between rows of drums was in compliance. No drums were stacked more than two high, and no leaks or spills were observed.

DOCUMENT REVIEW

Manifests

Manifests Accepted Reports, including waste rejected summaries, are submitted monthly to DTSC. No violations were noted. Manifest discrepancies, or the nonconforming file, are overseen by the scheduling and receiving supervisor. Problems remain in this "problems hold" file until the discrepancy is resolved. According to Chris Lilley, discrepancies include loads rejected, piece discrepancies, and 10 percent volume weight discrepancies. Waste analysis discrepancies determined during fingerprint analysis are generally resolved immediately;

however, significant waste analysis discrepancies do go to the nonconforming file. Once problems are resolved, paperwork is filed with the manifests. Summaries of the discrepancy are filed in a three-ring binder kept by the scheduling and receiving supervisor.

Incoming manifest sets for the period January 11 through June 3, 1994 were reviewed. The manifest sets were complete and properly signed and dated. Outgoing manifests for the same period were reviewed. The facility sign-off copy of Uniform Hazardous Waste Manifest No. 93130038 dated March 7, 1994 was not attached to the manifest filed in the facility's March 1994 outgoing manifest file. See Attachment 8. Pursuant to 40 CFR §264.72, the facility had not submitted to the Regional Administrator a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest at issue. Rollins OPC contacted the disposal facility, CWM Kettleman Hills; the sign-off copy was located and sent by fax to Rollins OPC. During the January 11, 1994 CEI, EPA had observed that Rollins OPC had inadvertently filed the return copy (sign-off copy) of Texas manifest 00331390 in the wrong file; thus the return copy could not be located at the time of the inspection. Proof of the return copy was subsequently sent to EPA and no potential violation was noted.

Unmanifested Waste Reports

Rollins OPC had not received any unmanifested waste during the period December 27, 1993 through June 2, 1994.

Financial Responsibility

A Rollins OPC internal memorandum dated May 12, 1994 states that a delay caused by their bank has impeded their progress in submitting necessary documentation to EPA. On July 8, 1994, Elaine Schimmel, EPA Financial Assurances Compliances Officer, forwarded Rollins OPC's financial assurances, closure costs and liability insurance information. In her transmittal, and subsequent phone call to SAIC on July 13, 1994, she stated that Rollins OPC is in compliance for these requirements (see Attachment 9).

Inspection Logs

Inspection procedures, schedules and logs are maintained by Rollins OPC as required by the facility's permit. Rollins OPC inspection logs were reviewed during the CEI. No violations

were observed. Desmond Phillip stated that, in addition to the inspection logs, maintenance service requests are completed for routine equipment replacements as preventive maintenance.

Tank Certification

Tank integrity assessments were conducted in November 1993 for all existing tanks and new tanks awaiting installation. EPA reviewed these assessments during the CEI conducted January 11, 1994. According to the EPA's CEI report, the assessments rated all tanks as not leaking and in good condition.

Training Records

The language of 40 CFR §264.16 Personnel Training is vague regarding specific training elements. Subsection 264.16 (d)(3) allows the facility to define the training requirements per position by "a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this section." Subsection 264.16(a)(3) requires "at a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems..." and 264.16(c) requires that facility personnel must take part in an annual review of the initial training required in paragraph (a).

Training records for current employees Jose Aguilar and Abby Pourhassanian (see Attachment 10) indicate that both employees successfully completed 8-hour annual hazardous waste training on January 27, 1994. However, Jose Aguilar has not received emergency/contingency plan/evacuation procedures training since July 27, 1990, and other than Dept 250/260 training, there is no indication that he has received any job position training since that time. The Rollins OPC Operating Procedures Manual states that specific operations training is required for all tasks, such as sampling, waste receiving, repacking, however there was no documentation in the training file for Jose Aguilar that he had received this task-specific training. It is recommended that Rollins OPC document that all operations technicians have received task-specific training and that emergency/contingency plan/evacuation procedures training be provided on an annual basis.

Waste Minimization Plan

Under direction from EPA, SAIC is to obtain a copy of the Waste Minimization Plan currently used, or planned for use by the facility. The Waste Minimization Plan for Rollins OPC is included as Attachment 11. No review of this plan was performed.

Review of Documents Required by the Permit

The following list of documents were verified during the review to be on file at the facility as specified by the Permit:

- The Emergency Contingency Plan revised March 1994 to include new warehouse evacuation routes and fire extinguisher locations.
- The Waste Analysis Plan revised in February 1992.
- The Annual Report for 1993 submitted to EPA February 29, 1994.

POTENTIAL VIOLATION

The following potential violation was discovered during the June 9, 1994 CEI.

RCRA Permit, Part III of the permit, General Facility Conditions, Item J. Manifest System

Item J. requires that the Permittee shall comply with the manifest requirements of 40 CFR §264.72 Manifest discrepancies. The facility sign off copy of Uniform Hazardous Waste Manifest No. 93130038 was not attached to the manifest filed in the facility's March 1994 manifest file. See Attachment 8. Pursuant to §264.72, the facility had not submitted to the Regional Administrator a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest at issue.

LIST OF ATTACHMENTS

1. Photograph Log
2. CEI Checklist for Generators
3. List of Reference Documents
4. Updated Part A Application and Class II Permit Modification Cover Letter
5. Interim Site Plan
6. Wastewater Treatment Unit Diagram
7. Volume of Treated Water Discharged to City of Los Angeles Sewer System
8. Uniform Hazardous Waste Manifest No. 93130038 (Sign off Copy sent to Rollins OPC via fax on June 9, 1994, upon observation that the sign off copy was not contained in Rollins OPC March 1994 Manifest file.)
9. Financial Assurance Documentation (letter to DTSC dated June 20, 1994) and Financial Responsibility Review findings (EPA, dated July 13, 1994)
10. Training Records
11. Waste Minimization Plan (Transmitted to DTSC on October 1, 1991)

ATTACHMENT 1
PHOTOGRAPH LOG

Rollins OPC Inc.

Photograph Log and Photographs

Photographer: Scott Kinderwater

Date: June 9, 1994

- Photo No. 1** The thermal oxidizer is the horizontal unit shown in the lower half of the photograph. The oxidizer was operating at the time of the inspection. The operating temperature was 1600 degrees F. According to Desmond Phillip, the lowest permissible temperature is 1500 degrees F. The yellow pipes are incoming emission lines from several process areas.
- Photo No. 2** The grey blue horizontal modules contain the hot silica rock beds of the newly constructed catalytic thermal oxidizer. Test runs have occurred. The unit will receive inorganic and organic emissions vented from the new process area. As such, it is a pollution control device as compared to a waste disposal unit.
- Photo No. 3** Process tank V-1 is used for acid neutralization and chrome reduction.
- Photo No. 4** Process tank V-2 is used for caustic neutralization and cyanide oxidation.
- Photo No. 5** This blue tank is the final polishing activated carbon tank V-5 AB. The treated wastewater polished in this tank goes to storage tank V-5 where it is sampled to determine whether it meets sanitary sewer discharge limitations. The spent carbon from V-5 AB is burned as hazardous waste at Rollins Environmental incinerators in either Texas or Louisiana.
- Photo No. 6** The acid gas scrubber exhaust pipe is the blue pipe on the left. The scrubber is also known as the caustic scrubber. The exhaust pipe is noticeably corroded. The thermal oxidizer exhaust pipe is the white pipe shown on the right. An induced draft fan adds atmospheric air to cool the exhaust prior to discharge. This exhaust pipe and the elbow below the pipe were observed to be oxidized.
- Photo No. 7** Immediately to the left of the elbow of the thermal oxidizer exhaust pipe is a .5-inch sampling port. It is visible as a shut-off valve. Air samples can be collected at this port.
- Photo No. 8** A hazardous waste label attached to a repacked drum of Rollins OPC generated waste. The repacked process date is 6/9/94. To confirm Rollins OPC ability to track any waste back in time, the inspector requested all documentation pertaining to Doc. No. 01042. This number is printed on the drum. The

corresponding tracking number OPC 110351-94 is also printed on the drum but not visible in the photograph.

- Photo No. 9 Empty drums which will not be reconditioned. These drums will be land disposed. The hazardous waste labels remain on the drums to identify the last contained substance.
- Photo No. 10 Empty drums inside a panel truck which will be sent for reconditioning. Both steel drums and polyethylene drums are shown.
- Photo No. 11 This photograph taken at 12:17 p.m. shows the container processing and container storage area. According to Desmond Phillip, the late morning is the busiest time for accepting incoming loads, sampling and processing. The foreground shows the staging area which was crowded. The area was kept clean and no spills or container leaks were observed.
- Photo No. 12 Four roll-off bins were stored at the facility during the inspection. All roll-off bins were covered. The roll-off bin nearer the doorway contained waste rags and debris. The generator listed on the hazardous waste label was NAS Lemmore. The doorway leads into the newly constructed process area which had not yet become operable at the time of the inspection.
- Photo No. 13 This photo shows the stinging (pumping) room in the new process area which is not yet operable. The area will be totally enclosed. This room will be used for aspirating drum liquids into bulk tanks for treatment. The drums will move via the conveyor rollers.



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DOC NO. 01042

HAZARDOUS WASTE

STATE & FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
 IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
 AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY
 OR THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL

GENERATOR INFORMATION

NAME: ROLLINS OPC
 ADDRESS: 5756 4TH ST
 CITY: LOS ANGELES STATE: CA ZIP: 90018
 PHONE: 323-441-1111
 EPA ID NO. / MANIFEST DOCUMENT NO.: TAH001

EPA WASTE NO. 0001 F002 CA WASTE NO. 112 ACCUMULATION START DATE 6-9-94
 CONTENTS, COMPOSITION: VARY -- BR33141 / 10 5055 30 PAINT SLUDGES

PHYSICAL STATE: ☐ SOLID ☐ LIQUID HAZARDOUS PROPERTIES: ☐ FLAMMABLE ☐ TOXIC
☐ CORROSIVE ☐ REACTIVITY ☐ OTHER

UN 1325 PG III
 (D001, F001, 000, 1000)
 D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!
 CONTAINS HAZARDOUS WASTE

Photo No. 8 A hazardous waste label attached to a repacked drum of Rollins OPC generated waste. The repacked process date is 6/9/94. To confirm Rollins OPC ability to track any waste back in time, the inspector requested all documentation pertaining to Doc. No. 01042. This number is printed on the drum. The corresponding tracking number OPC 110351-94 is also printed on the drum but not visible in the photograph.



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ATTACHMENT 2
CEI CHECKLIST FOR GENERATORS

TREATMENT/STORAGE/DISPOSAL FACILITIES (TSDF)
CEI CHECKLIST

SITE ID#: C A D 0 5 0 8 0 6 8 5 0

INSPECTION DATE:

6/9/94

SITE NAME: Rollins OPC Inc.

LOCATION: 5756 Alba Street

Los Angeles
City

CA 90058
State Zip Code

LEAD INSPECTOR: Scott Kinderwater

OFFICE: SAIC/San Francisco

(line out parts of the index below not applicable to facility inspected.)

INDEX FOR TSDF CHECKLIST - 40 CFR

Part & Page Contents

261/262: GENERATOR REQUIREMENTS
270:1 INTERIM STATUS QUALIFICATIONS
 2 Loss of Interim Status
265: GENERAL FACILITY STANDARDS
 B1 WASTE ANALYSIS PLAN
 B3 Security and Inspections
 B4 Training
 B6 Ignitable/Reactive/Incomp.Wastes
 C1 PREPAREDNESS AND PREVENTION
 D1 CONTINGENCY PLAN
 D2 " - Emergency Coordinator
 D4 " - Reporting
 E1 MANIFEST SYSTEM & RECORDKEEPING
 E2 Operating Records
 E4 Biennial Report
 F1 GROUND WATER MONITORING
 F3 Facilities Affecting GW Quality
 G1 CLOSURE & POST-CLOSURE
 H1 Est. & Financial Assur.
 H5 Liability Requirements
 I1 STORAGE IN CONTAINERS
 I3 " Accum Area Checklist
 J1 Hws in TANKS

Part & Page Contents

265: Continued
 K1 SURFACE IMPOUNDMENTS (SO4) (TO2)
 (D83)
 L1 WASTE PILES (SO3)
 M1 LAND TREATMENT (D81)
 N1 LANDFILLS (D80)
 O1 INCINERATORS (TO3)
 P1 OTHER THERMAL TREATMENT (TO4)
 P2 Open Burning/Open Detonation
 Q1 OTHER CHEM/PHYS/BIO TREATMENT
 RW1 DRIP PADS
 AA AIR EMISSIONS-Process Vents
 BB AIR EMISSIONS-Leaking Equipment
266: C1 RECYCLABLE MTLs/Use as disposal
 E1 USED OIL " " " "
 F1 PRECIOUS METALS reclamation
 G1 Lead-acid BATTERY RECLAMATION
 H1 HW burned in Boilers/Furnaces
268: LAND DISPOSAL RESTRICTIONS

Other checklists completed:

___ Transporter ___ Waste Minimization ___ Multi-Media

■ Updated to include final and published revisions of 40 CFR through 9/30/91.

Facility Representatives:

Chris Jolley
Desmond Phillip
Wilfred Ndubuisi

Other Inspectors:

none

Documents Copied or Requested:

see C&I inspection report

Areas Present / Inspected:

see C&I inspection report

**Facility Recipient
of Report**

**Mailing Address
(if different)**

Generators (Part 261)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility qualify as a <u>conditionally exempt small quantity generator</u> each calendar month by:			
Generating less than 100 kgs, and accumulating less than 1000 kgs of HW on site? 261.5(a),(g) or:	—	<u>X</u>	
Generating and accumulating less than 1 kg of acute HW, or 100 kgs of acute HW contaminated soil or spill residues? 261.5(e)(1-2)	—	<u>X</u>	
<u>If NO, proceed to the next page.</u>			
Did the quantity determination include all listed and characteristic wastes generated except: 261.5(d)-			
(1) HW removed from on-site storage?	—	—	
(2) HW produced by on-site treatment or reclamation of HW that was already counted once?	—	—	
(3) Spent materials that have already been counted once and that are reclaimed and subsequently reused on site? or:	—	—	
HW exempted from regulation? 261.5(c)	—	—	
Does the facility generate HW?	—	—	
Has the generator of solid wastes made a HW determination by determining if the waste is: (262.11)			
(a) Excluded from regulation under 261.4?	—	—	
(b) Listed as a HW in 261 Subpart D?	—	—	
(c) For purposes of compliance with Part 268, or if the waste is not listed in Part 261, Subpart D, has the generator determined if the waste exhibits a characteristic identified in 261 Subpart C by either:			
(1) Testing the waste?	—	—	
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used?	—	—	
(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?	—	—	

[NOTE: Disposal of the following PCB wastes & materials are exempt from 40 CFR Parts 261 thru 265 & notifications of Section 3010 of RCRA: (261.8)

- (1) PCB-containing dielectric fluid and electric equipment containing such fluid authorized for use and regulated under Part 761 of 40 CFR; and that
(2) Are HW only because of toxicity characteristics (Codes D018 through D043)

GENERATORS
(ALL except Conditionally Exempt)
(Part 262)

	Yes	No	Comments
Has the generator submitted a <u>Notification of Hazardous Waste Activity (EPA Form 8700-12)</u> and obtained an EPA ID number before handling HW? 262.12(a)	X		
Have they offered HW only to transporters or TSDs with an EPA ID#? 262.12(c)	X		
<u>HW Generation Points</u>			
The generator may accumulate HW at or near the point of initial generation without meeting storage deadlines provided: 262.34(c)(1)			
They have accumulated no more than 55 gallons of HW or one quart of acute HW? and:			N/A, facility generates more than 55 gallons of HW
The area is under the control of the operator of the process generating the waste? and:			
(i) The container is in good condition, compatible with the waste, and kept closed (except when HW is being removed or added)?			
(ii) The container is marked with the words "Hazardous Waste" or other words that identify the contents?			
When HW accumulates in excess of the above amounts, does the generator: 263.34(c)(2) -			
Continue to comply with the storage requirements above? and:			
Mark the container holding the excess with the date the excess amount of HW began accumulating? and:			

	Yes	No	Comments
Comply with all 90-day storage requirements within three days? (262.34(a))	___	___	N/A

Generators of Between 100 and 1000 kg/month
(Part 262)

	Yes	No	Comments
100-1000 kgs/mo. Generator Qualifications			
Does the facility generate between 100 and 1000 kilograms of non-acute* HW per month, and never accumulate more than 6000 kilograms of HW on site?	___	✓	___
<u>If NO, go to fully regulated generators.</u>			
Has the 100-1000 kg/mo. generator accumulated HW on site for no more than 180 days** without a permit or interim status? 262.34(d)	___	___	N/A
Have they accumulated less than 6000 kgs of HW on site at any time? 262.34(d)(1)	___	___	↓
If the generator exceeded the applicable storage time or quantity limit without an EPA extension, did they comply with all TSD storage facility regulations? 262.34(f)	___	___	
Did the 100-1000 kg/mo. generator that treats, stores, or disposes of HW on-site submit a Part A application by 3/24/87? 270.10(e)(iii)	___	___	
While accumulating waste, has the 100-1000 kg/mo. generator complied with the requirements for storage in containers, 65 Subpart I (except for the 50 foot rule (265.176))? 262.34(d)(2)	___	___	
Has the 100-1000 kg/mo. generator complied with the requirements for: 262.34(d)(4)	___	___	
65 Subpart C, preparedness and prevention? and:	___	___	
Clearly marked the date accumulation started on each container? and:	___	___	
Labelled each container and tank with the words "Hazardous Waste"?	___	___	

*Generators of more than 1 kg/mo., or who accumulate more than 1 kg at any time, of acute HW (listed in 261.33(e) are fully-regulated generators. [261.5(f)(2), revised 7/19/88].

**270 days if transported more than 200 miles to TSD facility. 262.34(e).

Continued: Generators of Between 100 and 1000 kg/mo (Part 262)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the generator have an EMERGENCY COORDINATOR (EC) on site or immediately available at all times? 262.34(d)(5)(i)	<input type="checkbox"/>	<input type="checkbox"/>	N/A
Is the following information posted next to the telephone: 262.34(d)(5)(ii)-			
(A) EC's name and phone number?	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Location of fire extinguishers, spill control material, and any fire alarms?	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If no direct alarms, the phone number of the fire department?	<input type="checkbox"/>	<input type="checkbox"/>	
Are all employees familiar with their jobs, proper waste handling, and emergency procedures? 262.34(d)(5)(iii)	<input type="checkbox"/>	<input type="checkbox"/>	
If an emergency has occurred, has the emergency coordinator: 262.34(d)(5)(iv)-			
(A) Tried to extinguish the fire, or called the fire department?	<input type="checkbox"/>	<input type="checkbox"/>	
(B) In the event of a spill, contained the flow of HW, and cleaned up as soon as possible?	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Determined if the emergency is threatening human health or surface water outside the facility, and if so called the National Response Center at (800) 424-8802 and reported:	<input type="checkbox"/>	<input type="checkbox"/>	
(1) The generator's name, address, and EPA ID#?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Date, time, and type of incident?	<input type="checkbox"/>	<input type="checkbox"/>	
(3) Quantity and type of HW involved?	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Extent of any injuries?	<input type="checkbox"/>	<input type="checkbox"/>	
(5) Estimated quantity and disposition of any recovered materials?	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Did generator keep copies of signed manifests, waste analysis, test results, or HW determinations for 3 yrs. after the waste was last sent for on/off-site treatment, storage, or disposal? 262.44(a)			N/A
Is the 100-1000 kg/mo. generator's HW reclaimed under a contractual agreement? 262.20(e)- If yes:			
(i) Does the waste reclamation contract specify the type of waste and frequency of shipments?			
(ii) Is the transport vehicle owned and operated by the recycler/reclaimer?			
(2) Did the generator keep a copy of the contractual agreement for 3 years after the agreement ended?			
If not reclaimed under contract, complete below and "Manifests" below.			
Did the 100-1000 kg/mo. generator who has not received a signed copy of the manifest from the TSD within 60 days submit a copy of the manifest to the RA with a note indicating they have not received confirmation of delivery? 262.42(b), 262.44(b)			
<u>MANIFESTS: - 262.20-</u>			
(a) Does the generator prepare a complete manifest according to the instructions (see Part 262 Appendix) before transporting HW off-site?	X		
b) Does the generator designate on the manifest one facility which is permitted to handle the HW?	X		
c) Has the facility designated an emergency alternate facility? or:		X	
d) Instructed the transporter to return the waste to the generator in the event an emergency prevents delivery?	X		

	Yes	No	Comments
Did the generator use the supplied manifest required by a consignment State: 262.21-			
(a) Where the receiving facility is located? or, if not provided by that state:	X		
(b) Where the generating facility is located?	X		
(c) If not provided by either state, the EPA form from another source?			<i>Inspector only observed state provided manifest form</i>
Did the manifest consist of enough copies? 262.22	X		
Did the generator: 262.23(a)			
(1) Sign the manifest by hand?	X		
(2) Obtain the signature of initial transporter and date of acceptance on manifest?	X		
(3) Keep one copy of the manifest (per 262.40(a))?	X		
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)	X		
If the SHIPMENT WAS SENT BY WATER or rail, did the generator send at least 3 copies of the manifest to the designated facilities? 262.23(c), -(d)			<i>N/A</i>
For hazardous waste shipments to a facility in an authorized state which is not yet authorized to regulate that waste as hazardous, has the generator: 262.23(e)			
1) Confirmed that the facility receiving the waste agrees to sign and return the manifest to the generator? and;			<i>N/A not evaluated</i>
2) Confirmed that any out-of-state transporter signs and forwards the manifest to the designated facility?			<i>not evaluated</i>

PRE-TRANSPORT REQUIREMENTS: Part 262, Subpart C

	Yes	No	Comments
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? 262.30	<u>X</u>	_____	_____
Are waste packages labeled in accordance with DOT regulations (49 CFR 172.101)? 262.31	<u>X</u>	_____	_____
and; 262.32 (a) including:			
Proper shipping name [table column 2]? <u>X</u>	_____	_____	_____
Proper ID number [table column 3A]? <u>X</u>	_____	_____	_____
Proper ORM designation for containers of ORM-A,B,C,D, or E wastes? <u>X</u>	_____	_____	_____
Are containers of 110 gallons or less marked with the following words: 262.32(b)			
HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.			
Generators Name & Address _____	<u>X</u>	_____	_____
Manifest Document Number _____	<u>✓</u>	_____	_____
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33	_____	_____	<u>not evaluated</u>

90-DAY STORAGE 262.34

If the generator does not have interim status (as TSD storage facility), have they accumulated HW on-site for less than 90 days? 262.34(a)	<u>X</u>	_____	_____
Are containers visibly marked with the date accumulation started? 262.34(a)(2)	<u>X</u>	_____	_____
Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)	<u>X</u>	_____	<u>some containers specify "CA waste"</u>

Interim Status:
(Part 270 Subpart G)

For existing HWM facility to be treated as having been issued a permit, has the facility:

	Yes	No	Comments
Obtained an EPA ID # by submitting a Notification of Hazardous Waste Activity? and/or: 265.11, 270.70(a)(1)	_____	_____	_____
Submitted a Part A permit application? ** 270.70(a)(1)	_____	_____	_____
Completed the Part A per 270.13? 270.70(b)	_____	_____	_____
If the facility handles toxicity characteristic waste(s), was an amended Part A submitted by 9/25/90?	_____	_____	_____
Never been denied a RCRA permit or interim status? 270.70(c)	_____	_____	_____
Has the facility complied with the following restrictions while operating under interim status: 270.71(a)-	_____	_____	_____
(1) Has only treated, stored or disposed of HW specified in the Part A?	_____	_____	_____
(2) Has only employed processes specified in the Part A?	_____	_____	_____
(3) Has not exceeded design capacities specified in the Part A?	_____	_____	_____
Has a revised Part A been submitted prior to the following changes: 270.72-			
(a) T/S/D of HW not previously identified in the Part A?	_____	_____	_____
(b) Increases in design capacity of processes?	_____	_____	_____
(c) Changes in or additions to processes?	_____	_____	_____
(d) 90 days prior to change in ownership?	_____	_____	_____
(e) Have the changes made not amounted to reconstruction? *	_____	_____	_____

*See footnote on page 270:2.

**Earliest applicable of: 11/19/80, 6 months after new reg's published, 30 days after they first become subject to reg's. (270.10(e)(i), -(iii)(3)).

	Yes	No	Comments
<u>Termination of interim status:</u>			
Did the facility submit a requested Part B in full, and on time? 270.10(e) (5), 270.73(b)	___	___	_____
For land disposal facilities granted <u>interim status prior to 11/8/84</u> , did the facility submit before 11/8/85: 270.73(c)-			
(1) Part B of permit application?	___	___	_____
(2) Certification of compliance with applicable ground water monitoring & financial responsibility requirements?	___	___	_____
For land disposal facilities granted <u>interim status after 11/8/84</u> , did the facility submit within 12 months: 270.73(d)-***			
(1) Part B of the permit application?	___	___	_____
(2) Certification of compliance with all GW monitoring and financial responsibility requirements?	___	___	_____
For incinerator facilities, did the facility submit a Part B before 11/8/86? 270.73(e)			
For all other facilities, was a Part B submitted before 11/8/88**?	___	___	_____
270.73(f)	___	___	_____

See also applicable interim-status requirements for surface impoundments 265.221(b) and landfills 265.301(b).

* >50% of the cost of an entirely new facility, except for changes made solely for complying with new regulations for tanks (265.193) and/or Land Disposal Restrictions (268).

** If no, interim status will terminate on 11/8/92.

** Land disposal facilities newly regulated under the Toxicity Characteristics rule, must comply with groundwater monitoring requirements by 9/25/91.

General Facility Standards:
(Part 265 Subpart B)

Required Notices:

Has the RA been notified at least 4 weeks prior to the receipt of HW from a foreign source? 265.12(a)
(see also Generators, 262 Subpart F.)

Yes No Comments

✓ — e.g. Mexico Allied Signal

Before transferring ownership or operation, has the facility notified the new owners/operators in writing of the requirements of Parts 265 and 270? 265.12(b)

— — N/A

If a permit has been transferred to a new owner/operator, was the permit modified or revoked and reissued to identify the new permittee? 270.40

— — N/A

General Waste Analysis:

Has the facility obtained a detailed chemical and physical analysis that contains all information that must be known to properly treat, store or dispose of each HW or non-hazardous wastes applicable under 265.113(d)? 265.13(a) (1)

✓ — —

Did the facility perform the analysis before treating, storing or disposing of any HW or non-hazardous wastes applicable under 265.113(d)? 265.13(a) (1)

✓ — —

Does the facility have records documenting the required HW analysis, e.g., lab reports, published data, generator supplied data as developed under Part 261? 265.13(a) (2)

✓ — —

Has the analysis been repeated to ensure that it is accurate and up-to-date? 265.13(a) (3)

✓ — quality control program

After 9/25/90, was the TCLP test used when applicable?

✓ — used only when waste is disposed to land and when Rollins OPC

Is the analysis repeated when there is a change in the generating process? 265.13(a) (3) (i)

-B1- ✓ — yes, when a special treatment is conducted, if process changes, however processes haven't changed

needs to certify that the waste will be disposed to land.

General Facility Standards: - Continued

(Part 265 Subpart B)

For off-site facilities, is the analysis repeated when the HW received does not match the HW designated on the manifest?
265.13(a)(3)(ii)

YES NO COMMENTS

✓ — —

For off-site facilities, does the facility inspect or analyze each movement of HW to verify that the HW received matches the identity of the HW specified on the manifest?
265.13(a)(4)

✓ — —

Has the facility developed and followed a written waste analysis plan, and is the plan kept at the facility? 265.13(b)

✓ — —

Does the waste analysis plan contain the following elements: 265.13(b)-

- (1) Parameters of analysis of each HW handled and the rationale for the selection of these parameters?
- (2) The methods which will be used to test for these parameters, including method 1311 (found in SW-846 or 40 CFR Part 261, Appendix II) if the facility handles Toxicity Characteristic waste(s)? 261.24
- (3) Sampling method used to obtain a representative sample of each HW?
- (4) Frequency with which the initial analysis will be reviewed or repeated?
- (5) For off-site facilities, the analysis that generators have agreed to supply?
- (6) The methods which will be used to meet the additional analysis requirements for:

✓ — —
— — —
✓ — —
✓ — —
✓ — —
✓ — —
✓ — —

Tanks?(265.198-200)
Surface Impoundments?(265.225)
Waste Piles?(265.252)
Land Treatment?(265.273)
Liquids in landfills?(265.314)
Incinerators?(265.341)
Thermal Treatment?(265.375)

— — —
— — —
— — —
— — —
— — —
✓ — —
— — —
N/A
N/A
N/A
N/A
N/A
for pass through and transfer
N/A

General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Other Treatment? (265.402)			
Land Disposal Restrictions? (268.7)	<input checked="" type="checkbox"/>		
Complete applicable checklist on each unit.			

FOR OFF-SITE FACILITIES, does the plan contain the following elements:
265.13(c)

(1) Description of procedures used to identify each movement of HW?	<input checked="" type="checkbox"/>		
(2) Description of the sampling method used to obtain a representative sample of the HW?			

Unless exempt under 265.14(a) (physical contact or disturbance of the waste and unit will not cause harm), do security measures include:

A 24-hour surveillance system? 265.14(b) (1) or:	<input checked="" type="checkbox"/>		<u>security service (24 hr)</u>
---	-------------------------------------	--	---------------------------------

Artificial or natural barriers that completely enclose the facility? 265.14(b) (2) (i) and:	<input checked="" type="checkbox"/>		
--	-------------------------------------	--	--

Means to control entry onto the active portions of the facility at all times? 265.14(b) (2) (ii)	<input checked="" type="checkbox"/>		
---	-------------------------------------	--	--

Are signs with the legend "Danger-Unauthorized Personnel Keep Out" or equivalent posted that are: 265.14(c)	<input checked="" type="checkbox"/>		
--	-------------------------------------	--	--

At each entrance and any other approach to active portions of the facility?	<input checked="" type="checkbox"/>		
---	-------------------------------------	--	--

Legible from at least 25 feet away?	<input checked="" type="checkbox"/>		
-------------------------------------	-------------------------------------	--	--

Written in English and any other language predominant in the surrounding area?			<u>english only</u>
--	--	--	---------------------

General Facility Standards: - Continued
(Part 265 Subpart B)

General Inspection Requirements:	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
Does the facility inspect for malfunctions, deterioration, operator errors, and HW discharges often enough to correct problems before they cause harm? 265.15(b) (1)	✓	—	_____
Does the facility follow a written inspection schedule? 265.15(a)	✓	—	_____
Is the schedule kept at this facility? 265.15(b) (2)	✓	—	_____
Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: 265.15(b) (3) -	✓	—	_____
Monitoring equipment?	✓	—	_____
Safety, emergency equipment?	✓	—	_____
Security devices?	✓	—	_____
Operating and structural equipment?	✓	—	_____
Does the schedule include: 265.15(b) (4)			
The frequency of inspection for each item?	✓	—	_____
Daily inspections for loading and unloading areas?	✓	—	_____
The inspection frequencies required for each unit?	✓	—	_____
Has the facility taken immediate remedial action to correct hazards revealed on an inspection? 265.15(c)	✓	—	_____
Are inspections recorded in an inspection log?	✓	—	_____
Does the log include: 265.15(d)			
Date and time of inspection?	✓	—	_____
Name of inspector?	✓	—	_____
Observations noted?	✓	—	_____
Date and nature of repairs or other remedial actions?	✓	—	_____
Are inspection records kept for 3 years? 265.15(d), 265.73(b) (5)	✓	—	_____

General Facility Standards: - Continued

(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility have a HW personnel training program? 265.16(a)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Directed by a person trained in HW management procedures? 265.16(a)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Does the program include training in emergency procedures including contingency plan implementation? 265.16(a)(3)- and:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(i) Procedures for using/inspecting, repairing, & replacing emergency & monitoring equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(ii) Key parameters for automatic waste feed cut-off systems?	<input type="checkbox"/>	<input type="checkbox"/>	waste water treatment personnel receive this training
(iii) Communication or alarm systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	part of site orientation video
(iv) Response to fire or explosions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(v) Response to ground water contamination incidents?	<input type="checkbox"/>	<input type="checkbox"/>	N/A
(vi) Emergency shutdown of operations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	in wastewater treatment plant
Are new personnel supervised until training is completed? 265.16(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Do new personnel complete the training within 6 months? 265.16(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Is personnel provided annual review of the initial training? 265.16(c)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Do personnel training records include for each HW job: 265.16(d)			
(1) Job title and name of person filling the position?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(2) Job Description?	<input type="checkbox"/>	<input type="checkbox"/>	
(3) Description of required HW training?	<input type="checkbox"/>	<input type="checkbox"/>	

(Part 265 Subpart B)

Yes

No

Comments

See C&I report, Rollins OPC
does not fully comply



X



1

X

1

ATTACHMENT 3
LIST OF REFERENCE DOCUMENTS

RCRA COMPLIANCE EVALUATION INSPECTION

ROLLINS OPC, Inc.

June 1994

The following sets of documents are requested from the above referenced facility to assist S.A.I.C. inspectors in evaluating compliance to RCRA regulations:

1. Manifest sets for waste received for the period December 27, 1993 through June 2, 1994 (including waste acceptance analytical results)
2. Daily and Weekly Inspection Reports and Daily Inspection Remedial Work Orders for the period December 27, 1993 through June 2, 1994
3. A copy of the current inspection schedule as required by 40 C.F.R. 264.15(b)
4. All unmanifested waste reports for the period December 27, 1993 through June 2, 1994
5. A copy of the facility's current statement of Financial Assurances and Closure Cost Estimates
6. All manifest discrepancies for the period December 27, 1993 through June 2, 1994
7. Tank test data and the most recent tank test inspection report
8. The 1993 Annual Report
9. All 1993 Twenty-four Hour Reporting documents
10. Copies of the training records for the following employees:

Jose Aguilar

Abby Pourhassanian

11. The Contingency Plan
12. The Waste Analysis Plan
13. The Waste Minimization Plan



ATTACHMENT 4

**UPDATED PART A APPLICATION AND
CLASS II PERMIT MODIFICATION COVER LETTER**

ROLLINS

ENVIRONMENTAL SERVICES

*Received 2/14/94
Allan Rizzo*

February 14, 1994.

Mr. Jeff Zelikson, Director
US EPA Region 9
75 Hawthorne Street,
San Francisco, CA 94105.

Mr. Jose Kou, Branch Chief
Facilities Management Branch
California EPA,
Department of Toxic Substances Control
1011 North Grandview Avenue,
Glendale, CA 91201.

Dear Messrs. Zelikson and Kou:

RE: CLASS TWO PERMIT MODIFICATION

In accordance with 40 CFR 270.42(b) and 22 CCR 66270.42(b), Rollins OPC Inc. hereby requests a Class Two Permit Modification of its hazardous waste permit. This will allow the management of newly listed RCRA waste codes and the reconfiguration of our permitted storage units by delaying or eliminating the construction of certain permitted units, while adding the interim storage unit "D" into the facility permit. The permitted unit summary is enclosed.

This modification will also allow the storage and transshipment of aerosol containers to permitted offsite facilities for incineration.

Management of these waste types at Rollins OPC will not require any changes to our current waste management practices. The facility has handled the same or similar wastes in the past as characteristic D001 and D002 wastes and household hazardous wastes, respectively.

Management of these waste streams will not require a modification of the facility's waste analysis plan (WAP). Sampling and analysis in the WAP are applicable to a wide range of waste types, and are primarily based on the physical and chemical properties of the particular waste and its appropriate disposition.

These changes are requested to provide the needed capacity to manage these newly listed waste streams and to help the generators track the disposal and subsequent destruction of these waste streams. The economic impact is significant in that, through waste consolidation and bulking, the waste generator saves in reduced transportation and disposal cost.

ROLLINS  INC.

5756 Alba Street • Los Angeles, California 90058 • FAX: (213) 585-9214 • Phone: (213) 585-5063

Recycling of hazardous waste through this facility will be increased. Waste that is difficult to recycle waste may be pretreated before being shipped offsite for further treatment.

Pursuant to 40 CFR 270.42(b) and 22 CCR 66270.42(b), the permittee must provide the applicable information required by 270.13 through 270.21, 270.62, and 270.63(66270.13 thru 66270.21, 66270.66, and 66270.63). All of this information is available in our Part B permit application, with the exception of the required Part A revision (enclosed). None of the other information will change as a result of this permit modification.


Specifically, we request approval to allow Rollins OPC Inc. a hazardous waste management facility located at 5756 Alba street in the City of Los Angeles, to manage waste with the following waste codes: D031, ~~F025~~, ~~F032~~, ~~F034~~, ~~F035~~, ~~F037~~, ~~F038~~, ~~F039~~, ~~K064~~, ~~K065~~, ~~K066~~, ~~K088~~, ~~K090~~, ~~K107~~, ~~K108~~, ~~K109~~, ~~K110~~, ~~K131~~, ~~K132~~, ~~K141~~, ~~K142~~, ~~K143~~, ~~K144~~, ~~K145~~, ~~K147~~, ~~K148~~, ~~K149~~, ~~K150~~, and K151.

We request approval to reconfigure our permitted container storage units, in order to enable the facility to increase its recycling activities, enhance waste segregation on site, and improve waste disposition options.

We request approval to receive, sort, bulk and store aerosol containers pending subsequent shipment off-site for incineration. This will reduce the amount of aerosol containers that would otherwise be landfilled. The environmental benefit is the improved protection of human health and the environment.

Enclosed with this request is the public notice of this permit modification in accordance with the requirement of a Class two permit modification. This announcement will be published in two local news papers in both English and Spanish, and also be sent to all on our mailing list, within seven days of this notification. This will mark the beginning of the 60 day comment period. A copy of the said public notice will be placed at the Florence Avenue, County of Los Angeles Library, 1610 E Florence Avenue, Los Angeles and at Holmes Avenue School, 5108 Holmes Avenue, Los Angeles, California.

We believe that the above information meets the requirements for a Class Two Permit Modification. Should there be any questions, please contact me or the Environmental Affairs Manager, Wilfred Ndubuizu at (213) 585-5063.

Sincerely,

William J. Mitzel
President

include
in
the
public
notice



**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
60-DAY PUBLIC COMMENT PERIOD AND
PUBLIC MEETING FOR HAZARDOUS WASTE FACILITY
PERMIT MODIFICATION REQUEST
ROLLINS OPC INC. (FORMALLY OIL PROCESS COMPANY)
EPA ID NO. CAD 050 806 850
5756 ALBA STREET LOS ANGELES, CALIFORNIA**

Rollins OPC Inc. will hold a public meeting on Saturday March 26, 1994. Starting at 10:00 a.m. The meeting will be held at Holmes Avenue School Auditorium, 5108 Holmes Ave., Los Angeles, California 90058; to discuss proposed permit modification and accept public comments on the modification. The public comment period for this request runs from February 21 to April 22, 1994.

On February 14, 1994 the Rollins OPC Incorporated requested that its hazardous waste facility permit 90 -3-TS-001 be modified by the California Department of Toxic Substances Control (DTSC) and by the U.S. Environmental Protection Agency (EPA) pursuant to California Health and Safety Code, Ch. 6.5; Title 22, California Code of Regulations, Sections 66270.42-66270.43 and the Resource Conservation and Recovery Act, 42 USC Sec. 6901 et seq., 40 C.F.R. Part 270).

If approved, the permit modification would allow the permittee to manage newly listed federal waste streams, household hazardous waste roundup waste, aerosol cans, mercury and other heavy metals recycling and waste generation minimization through process changes and technological advances at its facility located at 5756 Alba Street, Los Angeles, California 90058. This request will not add any capacity to the facility's current permit, nor have a significant change on how wastes are managed at the facility.

All persons wishing to comment on the proposed modification, may do so in person at the meeting or may do so in writing by April 22, 1994 (within 60 days of the date of this notice). Comments and questions should be directed to Andy Bajwa or Tom Mays, California Environmental Protection Agency, Department of Toxic Substances Control 1011 North Grandview Avenue Glendale, California 91201. (818)551-2800. The permittee's compliance history during the life of the permit being modified is also available there.

Copies of the permit modification request and supporting documents are available for public review and copying at DTSC, 1011 North Grandview Avenue Glendale, CA 91201. (818)551-2800 and the County Library 1610 E. Florence Avenue Los Angeles, Ca 90001 (213)581-8028 Thurs: 11 - 5pm. and Sat 12:00 to 5 pm.

The California Environmental Quality Act, require the DTSC to identify any significant environmental impact this proposal may have on the human health or the environment, and provide mitigating measures to make these impacts insignificant. The DTSC will make known its findings in a couple of weeks. The DTSC will make the final decision on the permit modification request, based on its technical review, and the review of all public comments received.

For EPA Regional Use Only <div style="border: 1px solid black; height: 100px; margin-top: 10px;"></div>	EPA United States Environmental Protection Agency Washington, DC 20460 <h2 style="margin: 10px 0;">Hazardous Waste Permit Application</h2> <h3 style="margin: 10px 0;">Part A</h3> <p style="margin: 0;">(Read the Instructions before starting)</p>	For State Use Only <div style="border: 1px solid black; height: 100px; margin-top: 10px;"></div>								
Date Received Month Day Year <div style="display: flex; justify-content: space-between;"> <div style="width: 10%;"> </div> <div style="width: 10%;"> </div> <div style="width: 10%;"> </div> <div style="width: 10%;"> </div> <div style="width: 10%;"> </div> <div style="width: 10%;"> </div> <div style="width: 10%;"> </div> <div style="width: 10%;"> </div> </div>										
I. ID Number(s)										
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; border-bottom: 1px solid black;">A. EPA ID Number</td> <td style="width: 50%; border-bottom: 1px solid black;">B. Secondary ID Number (If applicable)</td> </tr> <tr> <td style="border-bottom: 1px solid black;">C A D 0 5 0 8 0 6 8 5 0</td> <td style="border-bottom: 1px solid black;"></td> </tr> </table>			A. EPA ID Number	B. Secondary ID Number (If applicable)	C A D 0 5 0 8 0 6 8 5 0					
A. EPA ID Number	B. Secondary ID Number (If applicable)									
C A D 0 5 0 8 0 6 8 5 0										
II. Name of Facility R O L L I N S O P C I N C										
III. Facility Location (Physical address not P.O. Box or Route Number)										
A. Street 5 7 5 6 A L B A S T R E E T										
Street (continued) _____										
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%; border-bottom: 1px solid black;">City or Town</td> <td style="width: 10%; border-bottom: 1px solid black;">State</td> <td style="width: 30%; border-bottom: 1px solid black;">ZIP Code</td> </tr> <tr> <td style="border-bottom: 1px solid black;">L O S A N G E L E S</td> <td style="border-bottom: 1px solid black;">C A</td> <td style="border-bottom: 1px solid black;">9 0 0 5 8 -</td> </tr> </table>			City or Town	State	ZIP Code	L O S A N G E L E S	C A	9 0 0 5 8 -		
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1 9	L O S A N G E L E S									
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IV. Facility Mailing Address										
Street or P.O. Box 5 7 5 6 A L B A S T R E E T										
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City or Town	State	ZIP Code								
L O S A N G E L E S	C A	9 0 0 5 8 -								
V. Facility Contact (Person to be contacted regarding waste activities at facility)										
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; border-bottom: 1px solid black;">Name (last)</td> <td style="width: 50%; border-bottom: 1px solid black;">(first)</td> </tr> <tr> <td style="border-bottom: 1px solid black;">M I T Z E L</td> <td style="border-bottom: 1px solid black;">W I L L I A M J</td> </tr> <tr> <td style="border-bottom: 1px solid black;">Job Title</td> <td style="border-bottom: 1px solid black;">Phone Number (area code and number)</td> </tr> <tr> <td style="border-bottom: 1px solid black;">P R E S I D E N T</td> <td style="border-bottom: 1px solid black;">2 1 3 - 5 8 5 - 5 0 6 3</td> </tr> </table>			Name (last)	(first)	M I T Z E L	W I L L I A M J	Job Title	Phone Number (area code and number)	P R E S I D E N T	2 1 3 - 5 8 5 - 5 0 6 3
Name (last)	(first)									
M I T Z E L	W I L L I A M J									
Job Title	Phone Number (area code and number)									
P R E S I D E N T	2 1 3 - 5 8 5 - 5 0 6 3									
VI. Facility Contact Address (See Instructions)										
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; border-bottom: 1px solid black;">A. Contact Address</td> <td style="width: 75%; border-bottom: 1px solid black;">B. Street or P.O. Box</td> </tr> <tr> <td style="border-bottom: 1px solid black;"> Location Mailing <input checked="" type="checkbox"/> <input type="checkbox"/> </td> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td style="border-bottom: 1px solid black;">City or Town</td> <td style="border-bottom: 1px solid black;">State ZIP Code</td> </tr> <tr> <td style="border-bottom: 1px solid black;"></td> <td style="border-bottom: 1px solid black;"></td> </tr> </table>			A. Contact Address	B. Street or P.O. Box	Location Mailing <input checked="" type="checkbox"/> <input type="checkbox"/>		City or Town	State ZIP Code		
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Location Mailing <input checked="" type="checkbox"/> <input type="checkbox"/>										
City or Town	State ZIP Code									

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 12-31-91
GSA No. 0246-EPA-OT

EPA I.D. Number (enter from page 1)

Secondary ID Number (enter from page 1)

C A D 0 5 0 8 0 6 8 5 0

VII. Operator Information (see Instructions)

Name of Operator

R O L L I N S O P C I N C

Street or P.O. Box

5 7 5 6 A L B A S T R E E T

City or Town

L O S A N G E L E S

State

ZIP Code

C A

9 0 0 5 8 -

Phone Number (area code and number)

2 1 3 - 5 8 5 - 5 0 6 3

B. Operator Type

P

C. Change of Operator Indicator

Yes No X

Date Changed

Month Day Year

VIII. Facility Owner (see Instructions)

A. Name of Facility's Legal Owner

R O L L I N S O P C I N C

Street or P.O. Box

5 7 5 6 A L B A S T R E E T

City or Town

L O S A N G E L E S

State

ZIP Code

C A

9 0 0 5 8 -

Phone Number (area code and number)

2 1 3 - 5 8 5 - 5 0 6 3

B. Owner Type

P

C. Change of Owner Indicator

Yes No X

Date Changed

Month Day Year

IX. SIC Codes (4-digit, in order of significance)

Primary

Secondary

9 5 1 1 (description) Solid waste management

Secondary (description)

A. Permit Type (enter code)

B. Permit Number

C. Description

R

C A D 0 5 0 8 0 6 8 5 0

RCRA

R

9 0 - 3 - T S - 0 0 1

State Permit

P

2 1 4 9 3 4 2 1 4 9 3 3

Air Pollution prevention equipment

2 1 4 9 0 9 2 6 8 4 5 9

Permit and Permit To Construct

2 6 8 4 5 7 2 6 8 4 5 8

E

W 4 8 5 4 4 6

Industrial Waste Discharge Permit

EPA I.D. Number (enter from page 1)

C A D 0 5 0 8 0 6 8 5 0

Secondary ID Number (enter from page 1)

XI. Nature of Business (provide a brief description)

Provide off site treatment, storage and transfer of Hazardous waste, wastewater with Cyanide, Hexavalent Chrome, high and low pH Voc are treated on site and discharged through the City of Los Angeles Bureau of Sanitation Sewerage System. All other Hazardous waste are stored in drums, bulked into tanks and tran-shipped for incineration, further treatment or recycled off site.

XII. Process - Codes and Design Capacities

- A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in Item XIII.
- B. **PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process.
1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.
 2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. **PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	UNIT OF MEASURE	UNIT OF MEASURE CODE
D79	<u>DISPOSAL:</u> INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY	GALLONS	G
D80	LANDFILL	ACRE-FEET OR HECTARE-METER	GALLONS PER HOUR	E
D81	LAND APPLICATION	ACRES OR HECTARES	GALLONS PER DAY	U
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY	LITERS	L
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS	LITERS PER HOUR	H
S01	<u>STORAGE:</u> CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS	LITERS PER DAY	V
S02	TANK	GALLONS OR LITERS	SHORT TONS PER HOUR	D
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS	METRIC TONS PER HOUR	W
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS	SHORT TONS PER DAY	N
T01	<u>TREATMENT:</u> TANK	GALLONS PER DAY OR LITERS PER DAY	METRIC TONS PER DAY	S
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY	POUNDS PER HOUR	J
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR	KILOGRAMS PER HOUR	R
T04	OTHER TREATMENT <small>(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in Item XIII.)</small>	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY	CUBIC YARDS	Y
			CUBIC METERS	C
			ACRES	B
			ACRE-FEET	A
			HECTARES	Q
			HECTARE-METER	F
			BTU's PER HOUR	K

EPA I.D. Number (enter from page 1)												Secondary ID Number (enter from page 1)											
C	A	D	0	5	0	8	0	6	8	5	0												

XII. Process - Codes and Design Capacities (continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

Line Number	A. PROCESS CODE (from list above)				B. PROCESS DESIGN CAPACITY		C. PROCESS TOTAL NUMBER OF UNITS	FOR OFFICIAL USE ONLY			
					1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)					
X 1	S	0	2		600	G	0 0 2				
X 2	T	0	3		20	E	0 0 1				
1	S	0	1		140,540						
2	S	0	2		600,000						
3	T	0	1		380,500						
4	T	0	4		50,000						
5											
6											
7											
8											
9											
1 0											
1 1											
1 2											

NOTE: If you need to list more than 12 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for additional treatment processes in Item XIII.

XIII. Additional Treatment Processes (follow instructions from Item XII)

Line Number (enter numbers in sequence with Item XII)	A. PROCESS CODE			B. TREATMENT PROCESS DESIGN CAPACITY		C. PROCESS TOTAL NUMBER OF UNITS	D. DESCRIPTION OF PROCESS
				1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)		
	T	0	4	2,000	U		Chemical and Lab Pack - Physical Treatment
	T	0	4	43,000	U		Bulking, Dissolving, Mixing,
	T	0	4	5,000	U		Solidification, Stabilization, Encapsulation
	T	0	4				

EPA I.D. Number (enter from page 1)

C A D 0 5 0 8 0 6 8 5 0

Secondary ID Number (enter from page 1)

XIV. Description of Hazardous Wastes

- A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that processes that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of Item XIV-D(1).
- Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS									
				(1) PROCESS CODES (enter)					(2) PROCESS DESCRIPTION (If a code is not entered in D(1))				
X 1	K 0 5 4	900	P	T	0	3	D	8	0				
X 2	D 0 0 2	400	P	T	0	3	D	8	0				
X 3	D 0 0 1	100	P	T	0	3	D	8	0				
X 4	D 0 0 2												Included With Above

- 7 of 7 -

ATTACHMENT 5
INTERIM SITE PLAN

ALBA ST.

ALAMEDA ST.

ACCESS GATE

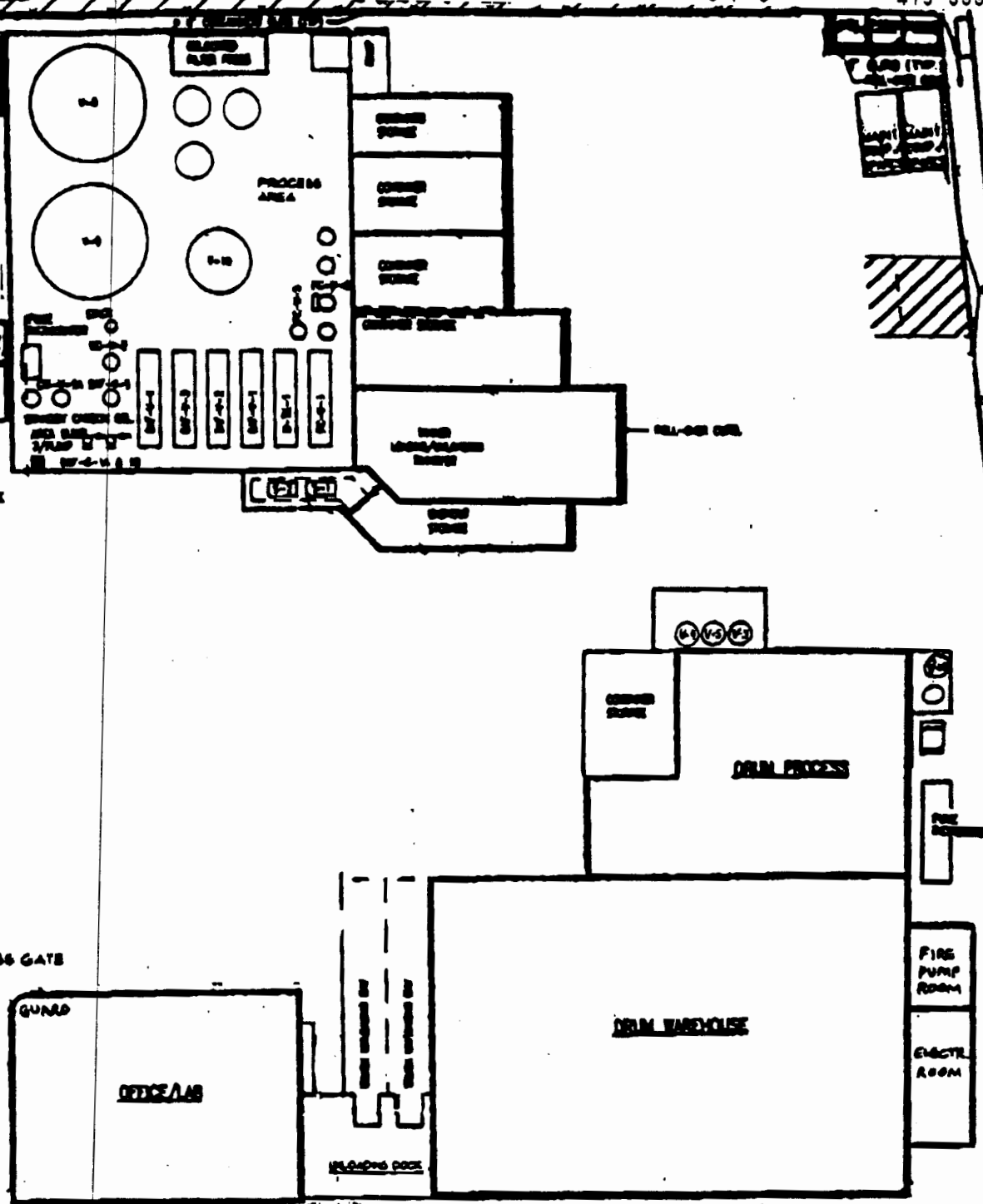
GUARD

OFFICE/LAB

LOADING DOCK

RAIL

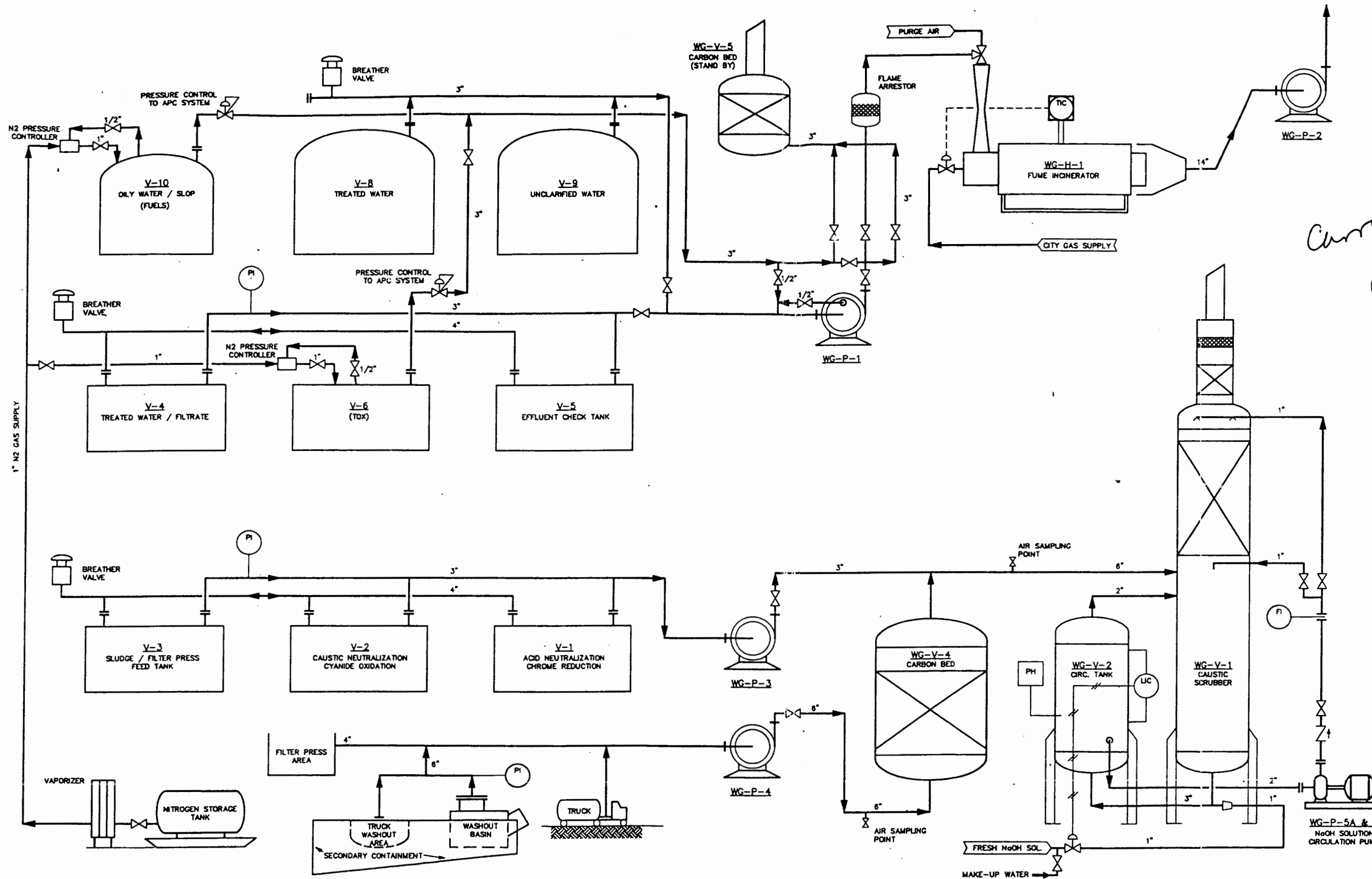
SLAUSON



OIL PROCESS COMPANY	
INTERIM/PROPOSED SITE PLAN	
1" = 20'	DATE: 6-14-94
BY: [signature]	APP: [signature]

ATTACHMENT 6

WASTEWATER TREATMENT UNIT DIAGRAM



Current as of
6/19/93
[Signature]

NUMBER	REFERENCE DRAWINGS

NOTES:

REV	DATE	ISSUE	BY	CHECKED	APPROVED	DRAWN	BRK

E & L ENGINEERING INC. <small>Engineers and Constructors Long Beach, California A Subsidiary of E&LCO SERVICES INCORPORATED</small>	
OIL PROCESS CO. WASTE WATER TREATMENT UNIT APC SYSTEM P & I D	
JOB NO E-0890	DWC NO OPC-P-2
SCALE NONE	REV A

ATTACHMENT 7

**VOLUME OF TREATED WATER DISCHARGED TO
CITY OF LOS ANGELES SEWER SYSTEM**

ROLLINS

ENVIRONMENTAL SERVICES

June 10, 1994

Steve Overton, Chief SIU
City of Los Angeles
Bureau of Sanitation
4590 Colorado Blvd.
Los Angeles, CA 90039
Attn: Self Monitoring Section

Re: Self Monitoring Report For May, 1994.

Dear Mr. Overton:

Enclosed you will find the summary of our off-site disposal for the month of May 1994. We treated and discharged into the sewage system 24,684 gallons of wastewater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Should you or your staff have any questions, please contact me at 213-585-5063.

Sincerely,



Willy I. Nduibuizu, P.E.
Environmental Affairs Manager

WN/a
wcity.1

ROLLINS  INC.

5756 Alba Street • Los Angeles, California 90058 • FAX (213) 585-9214 • Phone: (213) 585-5063

ATTACHMENT 8

**UNIFORM HAZARDOUS WASTE MANIFEST NO. 93130038
(SIGN OFF COPY SENT TO ROLLINS OPC VIA FAX ON JUNE 9, 1994,
UPON OBSERVATION THAT THE SIGN OFF COPY WAS NOT CONTAINED IN
ROLLINS OPC MARCH 1994 MANIFEST FILE)**



Chemical Waste Management, Inc.

CERTIFICATION OF COMPLIANCE AND DISPOSAL

Chemical Waste Management, Inc. certifies that as of 3-8-94
all items listed below that were received from _____
Rollins APC were disposed of in compliance
with all local, state and federal laws and regulations. Attached
is a copy of Manifest Number 9319038 dated 3-1-94.

Item #	<u>16</u>	Profile #	<u>K27177</u>
Item #	<u>110</u>	Profile #	<u>J33715</u>
Item #	_____	Profile #	_____
Item #	_____	Profile #	_____
Item #	_____	Profile #	_____
Item #	_____	Profile #	_____

Respectfully,

CHEMICAL WASTE MANAGEMENT, INC.

Cheryl Rocha
Cheryl Rocha
Site Service
Kettleman Hills Facility

Attachments

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address ROLLINS OPC 5756 ALBA STREET LOS ANGELES, CALIFORNIA 90058-3837		*IN EMERGENCY SEE BOX 15 BELOW*		A. State Manifest Document Number 93130038	
4. Generator's Phone (213) 585-5063 ATTN: SHIPPING/RECEIVING		6. US EPA ID Number		B. State Generator's ID H A H 0 3 6 0 1 7 3 6 1	
5. Transporter 1 Company Name Custom Environmental Transport		8. US EPA ID Number D E D 9 8 0 9 1 8 8 5 0		C. State Transporter's ID H A H 0 3 6 0 1 7 3 6 1	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 310/762-9176	
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT 35251 OLD SKYLINE ROAD KETTLEMAN CITY, CALIFORNIA 93239		10. US EPA ID Number C A T 0 0 0 6 4 6 1 1 1 7		E. State Transporter's ID	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity	
a. RQ, HAZARDOUS WASTE, SOLID, N.O.S., 9, NA3077, III, (D004) (FILTERCAKE WITH ARSENIC, LEAD)		0 0 1 C M		0 0 0 1 2 Y	
b. RESIDUE LAST CONTAINED WASTE FLAMMABLE LIQUID, N.O.S., 3, UN1993, III		0 0 1 C M		0 0 0 4 0 Y	
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above		I. Waste Number	
11a) K27177:D004,D005,D006,D007,D008,D010,D011,F006,F007,F008,F009,F011,F012,F019; BOX: 425 .CA HAULER: 423476.		a.		State 491 EPA: Other D004	
11b) J33785:RCRA EMPTY CONTAINERS.ADD.CODES:513 BOX: 431 .CA HAULER: 416847.		b.		State 512 EPA: Other NONE	
15. Special Handling Instructions and Additional Information		c.		State	
IF UNABLE TO DELIVER, RETURN TO THE GENERATOR. AVOID CONTACT WITH MATERIAL, IF NECESSARY WEAR PROTECTIVE GEAR. IN CASE OF ACCIDENT OR SPILL CONTACT CHEMTREC AT 1-800-424-9300.		d.		State	
DOT ERG's; 11a) 31 11b) 31 **CD REQUESTED** CONFIRMATION#				EPA: Other	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable federal, state and international laws.					
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Richard Iniguez		Signature Richard Iniguez		Month Day Year 03 07 94	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Steve Erickson		Month Day Year 03 07 94	
Printed/Typed Name Steve Erickson		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

DO NOT WRITE BELOW THIS LINE.

DO NOT WRITE BELOW THIS LINE.

Department of Toxic Substances Control
Sacramento, California

Blue: GENERATOR SENDS THIS COPY TO DTSC WITHIN 30 DAYS.
To: P.O. Box 400, Sacramento, CA 95812-0400

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM
SUPPLEMENTAL PAGE # 2 of 2

(*Count only supplemental pages)

Generator Name: Rollins OPC

Manifest Doc. No.: 00840

CWM Profile Number: 27177

State Manifest No. CA9313028

This form is a continuation from Form CWM-2001-A for a waste identified by more than ten USEPA waste code/subcategories groups. This page by itself IS NOT an acceptable Land Disposal Notification and Certification Form!

Continue (from form CWM-2001-A) to identify ALL USEPA hazardous wastes that apply to this waste shipment (as defined by 40 CFR 261). For each waste number, identify the corresponding subcategory (write in the description from 40 CFR 268.41, .42 or .43, or check NONE if the waste does not have a subcategory). Also identify in column 7 which treatment standards apply. If the waste is subject to a specified technology standard (268.42) write the five letter treatment code(s) in the space provided. Spent Solvent and California List treatment standards are listed on the back of the first page. F039 treatment standards, if applicable, must be attached.

REF	4. US EPA HAZARDOUS WASTE CODE(S)	5. SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE SIMPLY CHECK NONE		6. APPLICABLE TREATMENT STANDARDS			7. HOW MUST THE WASTE BE MANAGED ENTER THE LETTER FROM BELOW
				6 a. PERFORMANCE-BASED: CHECK AS APPLICABLE		6 b. SPECIFIED TECHNOLOGY: IF APPLICABLE ENTER THE 40 CFR 268.42-TABLE 1 TREATMENT CODE(S)	
		DESCRIPTION	NONE	268.41(a)	268.43(a)	268.42(a)	
1	F001		X	X	X		Landfills ↓
2	F011						
3	F012						
4	F019						
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							

To list additional USEPA waste code(s) and subcategory(s), use another supplemental sheet (CWM-2001-B) and check here: ☐

I hereby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.
 Signature: Chris Kelly Title: S-R Date: 3-7-94

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name: Rollins OPC

Manifest Doc. No.: 00840

CWM Profile Number: K27177

State Manifest No: CA9313009

- Is this waste a non-wastewater or a wastewater? (See 40 CFR 268.2) Check ONE: ☐ Non-Wastewater ☐ Wastewater
- If this waste is subject to any California List restrictions enter the letter from below (either A, B1, or B2) next to each restriction that is applicable
 _____ HOCs. _____ PCBs. _____ Acid. ☒ Metals. _____ Cyanides.
- Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subdivision, or check NONE if the waste code has no subdivision. Also check which treatment standards apply. Spent solvent and California List treatment standards are listed on the back of this form. If F039, multi-source leachate applies, those standards must be attached by the generator.

REF	4. US EPA HAZARDOUS WASTE CODE(S)	5. SUBDIVISION		6. APPLICABLE TREATMENT STANDARDS			7. HOW MUST THE WASTE BE MANAGED? ENTER THE LETTER FROM BELOW
		ENTER THE SUBDIVISION DESCRIPTION IF NOT APPLICABLE SIMPLY CHECK NONE		6 a. PERFORMANCE-BASED CHECK AS APPLICABLE		6 b. SPECIFIED TECHNOLOGY IF APPLICABLE ENTER THE 40 CFR 268.42 TABLE TREATMENT CODE(S)	
		DESCRIPTION	NONE	268.41(a)	268.43(a)	268.42(a)	
1	D004		X	X			A (metals)
2	D005						
3	D006						
4	D007						
5	D008						D (cyanides)
6	D010						
7	D011						
8	F006				X		
9	F007				X		
10	F008				X		

To list additional USEPA waste code(s) and subcategory(s), use the supplemental sheet provided (CWM-2001-B) and check here: ☐

HOW MUST THE WASTE BE MANAGED? In column 7 above, enter the letter (A, B1, B2, B3, C, or D) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B2, B3, or D, you are making the appropriate certification as provided below.

A. RESTRICTED WASTE REQUIRES TREATMENT

This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268 Subpart D, 268.32, or RCRA Section 3004(d).

B.1 RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

B.3 GOOD FAITH ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR Part 264 Subpart O or Part 265 Subpart O, or by combustion-fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

C. RESTRICTED WASTE SUBJECT TO A VARIANCE

This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 7 above.

D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

"I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D, and all applicable prohibition levels set for Section 268.32 or RCRA Section 3004(d), and therefore, can be land disposed without further treatment. A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth on 40 CFR 268.32 or RCRA section 3004(d). I believe the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false certification, including the possibility of a fine and imprisonment."

E. WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS

This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

The information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

If the waste identified on the other side of this form is subject to any prohibitions identified as California List restrictions (22 CCR 66268.32), then this page MUST accompany the shipment, along with the opposite side of this form.

CALIFORNIA LIST TREATMENT STANDARDS-22 CCR 66268.32, 22 CCR 66268.42 A waste must first be designated as a hazardous waste before the waste can be subject to the California List restrictions.		
Restricted waste description	Prohibition	Treatment Standard
Liquid* or nonliquid wastes containing Halogenated Organic Compounds listed in 22 CCR 66268 Appendix B* or B-A	Liquid* wastes: Greater than or equal to 1,000 mg/l Nonliquid wastes: Greater than or equal to 1,000 mg/kg	22 CCR 66268.42(a)(2) - INCM
Liquid* wastes containing Polychlorinated Biphenyls (PCBs)	Greater than or equal to 50 ppm	22 CCR 66268.42(a)(1) - INCM or FSUBS Also see 40 CFR 761.60 and 40 CFR 761.70
Liquid* wastes containing Cyanides	Free (amenable to chlorination) cyanides at concentrations greater than or equal to 1,000 mg/l	22 CCR 66268.32(a)
Liquid* wastes containing Metals	One or more of the following metals (or elements) at concentrations greater than or equal to the following: Arsenic and/or compounds as As: 500 mg/l Cadmium and/or compounds as Cd: 100 mg/l Chromium and/or compounds as Cr: 500 mg/l Lead and/or compounds as Pb: 500 mg/l Mercury and/or compounds as Hg: 20 mg/l Nickel and/or compounds as Ni: 134 mg/l Selenium and/or compounds as Se: 100 mg/l Thallium and/or compounds as Th: 130 mg/l	22 CCR 66268.32(a)
Liquid* Acid wastes	pH less than or equal to 2.0	22 CCR 66268.32(a)

*For the definition of "liquid" refer to Method 9005, the Pour Filter Liquids Test, from USEPA manual SW-846

JUN-09-1994 14:58 FROM CWM-KHF SITE SERV

TO

912135856270 P.02

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-94)
Please print or type. Form designed for use on elite 12-pitch typewriter.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1

Information in the shaded areas
is not required by Federal law.

C A D Q 5 0 8 0 6 8 5 0

of 1

93130038

3. Generator's Name and Mailing Address

IN EMERGENCY SEE BOX 15 BELOW

ROLLINS OPC
5756 ALBA STREET
LOS ANGELES, CALIFORNIA 90058-3837

4. Generator's Phone (213) 585-5063 ATTN: SHIPPING/RECEIVING

5. Transporter 1 Company Name

6. US EPA ID Number

Custom Environmental Transport DED 980918850

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
CHEMICAL WASTE MANAGEMENT
35251 OLD SKYLINE ROAD
KETTLEMAN CITY, CALIFORNIA 93239

10. US EPA ID Number

C A T 0 0 0 6 4 6 1 1 7

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type13. Total
Quantity14. Unit
Wt/Vol

15. Waste Number

RQ, HAZARDOUS WASTE, SOLID, N.O.S., 9, NA3077, III,
(D004) (FILTERCAKE WITH ARSENIC, LEAD)

0 0 1 C M

0 0 0 1 2

Y

State
491
EPA/Other
D004

b. RESIDUE LAST CONTAINED WASTE FLAMMABLE LIQUID,
N.O.S., 3, UN1993, III

0 0 1 C M

0 0 0 4 0

Y

State
512
EPA/Other
NONE

16. Special Handling Instructions and Additional Information

IF UNABLE TO DELIVER, RETURN TO THE GENERATOR. AVOID CONTACT WITH MATERIAL, IF NECESSARY
WEAR PROTECTIVE GEAR. IN CASE OF ACCIDENT OR SPILL CONTACT CHEMTREC AT 1-800-424-9300.

DOT ERG's; 11a) 31 11b) 31 **CD REQUESTED** CONFIRMATION# 86382-1-2

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable federal, state and international laws.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month

Day

Year

Richard Eniguez

Richard Eniguez

03 07 94

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month

Day

Year

Steve Erickson

Steve Erickson

03 07 94

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month

Day

Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Signature

Month

Day

Year

W. Country

W. Country

03 07 94

DO NOT WRITE BELOW THIS LINE

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-927-7535

ATTACHMENT 9

**FINANCIAL ASSURANCE DOCUMENTATION
(LETTER TO DTSC DATED JUNE 20, 1994) AND
FINANCIAL RESPONSIBILITY REVIEW FINDINGS
(EPA, DATED JULY 13, 1994)**

ROLLINS

ENVIRONMENTAL SERVICES

June 20, 1994

Scott Simpson
California Environmental Protection Agency
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, CA 91201

Dear Mr. Simpson:

Re: Update Closure Cost Estimate
Rollins OPC Inc.
EPA I.D. #CAD050806850

Enclosed you will find our updated closure cost estimate. The closure plan has been revised to account for the completion and activation of the new container storage and process buildings.

Our current estimated closure cost for existing and new units is \$375,672 (adjusted for inflation at 2.7%). Our current financial assurance letter of credit is \$359,256. Pursuant to Title 22, CCR section 66264.143(a)(2), the trust agreement and the letter of credit shall be updated to reflect the current closure cost estimate within 60 days of this notification. We have also enclosed copies of our financial responsibility documents.

I certify under penalty of law that this document and all attachments were prepared under my direct supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, and accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for a known violation.

Should you have any questions, please contact me at 213-585-5063.

Sincerely,


William J. Mitzel
President

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages > 3

To	SUE CORBALLY	From	ELMIRE SCHIMMEL
Dopl./Agency	DAIC	Phone #	744-2146
Fax #	399-0299	Fax #	744-1044
NSN 7540-01-317-7368		5009-101	
GENERAL SERVICES ADMINISTRATION			

ROLLINS  INC.

5756 Alba Street • Los Angeles, California 90058 • FAX: (213) 585-9214 • Phone: (213) 585-5063

FINANCIAL ASSURANCE SUMMARIES - Rollins OPC
Updated: March 14, 1994

	(1) 1990	(2) 1991	(3) 1992	(4) 1992 (A)	(5) 1993	(6) 1994
CLOSURE:						
Transportation	22	23	24	38	39	39.918
Disposal	50	52	54	67	69	70.896
Purchase Materials & Supplies	18	19	19	18	19	19.429
Labor	96	100	104	103	106	108.500
Closure Certification	20	21	22	21	21	21.831
Warehouse						98.682
TOTAL CLOSURE COSTS	206	214	222	247	254	359.256
Contingency (20%)	41	43	44	49	51	0.000
TOTAL FINANCIAL ASSURANCE	247	257	267	296	304	359.256

1 Source: DOHS Permit Application submitted 12/89

2 1991 inflation adjustment determined by dividing the most recent GNP Deflator (Q490 = 1114.5) by the Index from the first quarter of 1989 (Q489 = 109.9). Inflation adjustment =

4.2%

3 1992 inflation adjustment determined by dividing the most recent GNP Deflator (Q491 = 118.9) by the Index from the first quarter of 1990 (Q490 = 114.5). Inflation adjustment =

3.8%

4 Revision to closure costs as included in the Update Closure Cost Estimate dated 3/10/93.

5 1993 inflation adjustment determined by dividing the most recent GNP Deflator (Q492 = 122.2) by the Index from the first quarter of 1991 (Q491 = 118.9). Inflation adjustment =

2.8%

6 1994 inflation adjustment determined by dividing the most recent GNP Deflator (Q393 = 124.5) by the Index from the first quarter of 1991 (Q392 = 121.2). Inflation adjustment =

2.7%

LIABILITY CERTIFICATE OF INSURANCE

Additional space needed, add attachment.

Insurer Name COMMERCE AND INDUSTRY INSURANCE Co.	Address 70 PINE STREET NEW YORK, NY 10270	License Number Issued by State of:
Insured Name ROLLINS OPC, INC. d/b/a ROLLINS OPC	Address 5756 ALBA STREET LOS ANGELES, CA	

Hazardous Waste Facilities/TTUs Covered: (Enter Information For Each Facility/TTU)

LIMITS OF LIABILITY

NAME OF FACILITY/TTU	ADDRESS OF FACILITY/TTU	HAZARDOUS WASTE FACILITY/TTU ID NUMBER	SUDDEN* OCCURRENCES Each Occurrence/ Annual Aggregate Amount	NONSUDDEN* OCCURRENCES Each Occurrence/ Annual Aggregate Amount
Rollins OPC INC d/b/a	5756 Alba Street	CAD 050806850		10,000,000
Rollins OPC	Los Angeles, CA		/	10,000,000
			/	/
			/	/
			/	/
Policy Number		Effective Date	Total	Total
LL 5873494		10/1/93	/	10,000,000
			/	10,000,000

*Including legal costs and deductibles

SURER CERTIFICATION:

1. This endorsement certifies that this policy has provided liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under Division 4.5, Title 22, California Code of Regulations. The coverage applies to the above listed facilities/TTUs for:

"SUDDEN AND NONSUDDEN OCCURRENCES"

*"Sudden accidental occurrences," "nonsudden accidental occurrences," or "sudden and nonsudden accidental occurrences," is coverage for multiple facilities/TTUs and the coverage is meant for different facilities/TTUs indicate which facilities/TTUs are insured for sudden accidental occurrences, which are insured for nonsudden accidental occurrences, and which are insured for both.

The limits of liability are the amounts stated above for "each occurrence" and "annual aggregate," exclusive of legal defense costs. If the endorsement is for an excess insurance policy, complete the following sentence:
 _____ each occurrence and \$ _____ annual aggregate in excess of the underlying limits of
 _____ each occurrence and \$ _____ annual aggregate."

2. The Insurer further certifies the following with respect to the insurance described above;

(a) Bankruptcy or insolvency of the insured shall not relieve the insurer of its obligations under the policy.

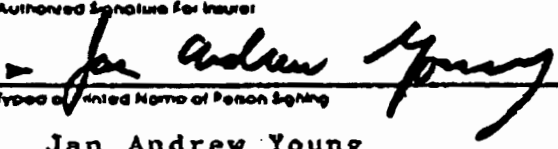
(b) The insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in Section 66264.147 and 665147, Title 22, California Code of Regulations.

(c) Whenever requested by the Department of Health Services (DHS), the insurer agrees to furnish to DHS original policy and all endorsements.

(d) Cancellation of the insurance, whether by the insurer or the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility/TTU, may occur only by sending notice of cancellation by either registered or certified mail to DHS. Cancellation will not be effective until after the expiration of sixty (60) days after receipt of the notice of cancellation as evidenced by the returned receipt.

(e) Any other termination of the insurance may occur only by sending notice of cancellation by either registered or certified mail to DHS. Cancellation will not be effective until after the expiration of thirty (30) days after receipt of cancellation as evidenced by the returned receipt.

The party below certifies that this document is being executed in accordance with the requirements of Article 8 of Chapters 14 and 15, Title 22, California Code of Regulations, and that the insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

Authorized Signature for Insurer 	Title Underwriting Manager
Typed or Printed Name of Person Signing Jan Andrew Young	Date 9/29/95
Address of Person Signing for Insurer 2205 Market Street, Philadelphia, PA 19103	

PRIVACY STATEMENT

This information is requested by the Department of Health Services, Toxic Substances Control Program, under Health and Safety Code, Section 25245 in order to verify adequate financial assurance of hazardous waste facilities/transportable treatment units. Completion of the form is mandatory. The consequence of not completing the form is denial of a permit to operate a hazardous waste facility/TTU. Information may be provided to U.S. Environmental Protection Agency (EPA), State Attorney General, Air Resources Board, California Waste Management Board, Energy Resources Conservation and Development Commission, Water Resources Control Board and California Regional Water Quality Control Boards. For more information or access to your records, contact the Toxic Substances Control Program, 400 P Street, Sacramento, CA 95814, (916) 324-2423.

STATE OF CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

FINANCIAL RESPONSIBILITY REVIEW FINDINGS

TO: LILY WORLD

SEB FPB FMB SMB OTHER

SEB FPB FMB SMB OTHER

FROM: ELAINE SCHIMMEL

PHONE:

FINANCIAL RESPONSIBILITY COORDINATOR REGION

1 2 3 4

For the purpose of the financial responsibility review, the results of the evaluation are good for sixty (60) days from the date of this review and are as follows:

~~FINANCIAL ASSURANCE FOR CLOSURE POST-CLOSURE~~Type of Document: LETTER OF CREDIT / TRUST Results: PASS FAILDocument Amount Closure: 359,256Document Amount Post-closure: NAClosure Cost Estimate: 375,672Post-closure Cost Estimate: NADeficiency Closure: 16,416Deficiency Post-closure: NAVIOLATION: See Comments Below.~~LIABILITY COVERAGE~~Type of Document: CERTIFICATE OF INSURANCE Results: PASS FAILDocument Amount Sudden: 5 MIL / 10 MILDocument Amount Non-Sudden: NADeficiency Sudden: 0Deficiency Non-Sudden: NAVIOLATION: NONE~~COMMENTS~~

Facility submitted an updated Closure Cost Estimate dated 6/14/94. Facility has 60 days to increase Coverage in L/C - \$16,416.

However, it should also be noted that, in addition to the L/C & Backup Trust, the facility has collateral in the form of a Certificate of Deposit in the amount of 359,282.96 signed by Rollins (P.C. President and Secretary, dated 5/9/94 (Southern California Bank SBC Note # 404-267924; maturity date 04/04/95).

PR COORDINATOR

DATE

SENIOR

DATE

7/13/94

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages 1

To: SUE CORBALEY From: ELAINE SCHIMMEL
 Dept./Agency: 241C Phone #: 744-2146
 Fax #: 399-0299 Fax #: 744-1044

ATTACHMENT 10
TRAINING RECORDS

Social Security No. 557-27-1496Date of Birth 3/22/50

Date of Termination _____

EMPLOYEE DEVELOPMENT RECORD

<u>POURHASSANIAN, ABBY</u> EMPLOYEE NAME		<u>OPC-DEPT. 225</u> DISTRICT/BRANCH		<u>8/3/81</u> DATE HIRED			<u>FOREMAN</u> JOB TITLE	
SUBJECT	INSTRUCTOR	DATE(S) OF INSTRUCTION	O.J.T.	C.I.	M/S	OTHER	HOURS OF INSTRUCTION	COMMENTS
OSHA H2O. WST. OPER. & EMERG. RESPONSE	NORMAN V. RYAN	7/31/89 to 8/4/89		X	X		40 HRS.	
RCRA FOR H2O. WST. OPER. & EMERG. RESP.	NORMAN V. RYAN	8/4/89		X	X		8 HRS.	
CPR & STD. FIRST AID	NORMAN V. RYAN	7/31/89		X	X		8 HRS.	
ROLLINS SUPERVISOR SPECIFIC FOR H2O. WST. OPER.	PAUL A.B. THOMAS	8/16/89		X			8 HRS.	
SAFE LIFTING TECHNIQUES & MAT. SFTY. DATA SHEETS	CHRIS J. LILLEY	6/20/90				X	30 min.	
EMERG. RESPONSE TEAM FORMATION & RES SFTY. INDOCT.	VICTORIA VALLIERE	7/25/90		X	X		1 HR.	
OPC PLANT EVACUATION PROCEDURES	VICTORIA VALLIERE	7/27/90		X			1/2 HR.	
MSA LEVEL I SCBA USE, INSP. & MAINT.	MICKEY ALLEN	8/7/90		X	X		1 1/4 HR.	
ADULT CPR	VICTORIA VALLIERE	8/29/90		X	X	X	4 HRS.	
OSHA/RCRA ANNUAL UPDATE	NORMAN RYAN	11/15/90		X	X		8 HRS.	
DEPT. 225	ROBERT GOLD	3/12/91		X		X	30 min.	
HANDLING HAZ. WASTE, EMERG. RESPONSE, 1st RESP. PLAN	VICE. IN. DEPT. 225 STAN. CARR	7-14-92 to 7-27-92		X	X	X	27 HRS.	1 HRS. 10

ROLLINS ENVIRONMENTAL SERVICES
Health and Safety Training

This is to Certify that
Abby Pourhassanian
social security # 557-27-1964

has successfully completed
8 Hour Annual
Hazardous Waste Training

in accordance with 29 CFR 1910.120
January 27, 1994

Completion Date



Regional CHEMPAK Safety & Health Manager, Instructor

ROLLINS ENVIRONMENTAL SERVICES
Health and Safety Training

This is to Certify that
Jose Aguilar
social security # 560-84-5338

has successfully completed
8 Hour Annual
Hazardous Waste Training

in accordance with 29 CFR 1910.120
January 27, 1994

Completion Date

Dore A. Hicks

Regional CHEMPAK Safety & Health Manager, Instructor

ATTACHMENT 11

**WASTE MINIMIZATION PLAN
(TRANSMITTED TO DTSC ON OCTOBER 1, 1991)**



RECEIVED

JUL 13 1994

SAIC - SAN FRANCISCO

October 1, 1991

Scott Simpson
California- Environmental Protection
Agency/Region 3
Department Of Toxic Substances Control
1405 No. San Fernando Blvd. Suite 300
Burbank, Ca 91504

Ref: Oil Process Company
EPA I.D. No. CAD 050806850

Mr. Simpson:

Attached is OPC'S waste minimization plan as required by our hazardous waste facility permit.

Please note that reduction in quantities resulting from these minimization plans have been based on the current amount of waste received at our facility. should the amount of waste received change, we estimate the waste reductions will change as a percentage of the amount currently received.

Some of our waste minimization plans call for use of various treatment chemicals to reduce the waste produced in wastewater treatment. The savings in waste minimization resulting from the use of these chemicals will have to be weighed against the safety issues involved with these chemicals. The final decision will be a result of an overall design/safety review of our plans prior to implementation.

If you have any questions, please do not hesitate to contact me at 213-585-5063.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Reed", written over a horizontal line.

Ron Reed
Vice President and General Manager

cc: Tom Kelley
US-EPA
75 Hawthorn
Mail drop H-3-2
San Francisco, Ca 94105

cc: Jerry Jordan
Maury Hunt
Desmond Phillip
Chris Lilley
Tim Sloan

**OIL PROCESS COMPANY
WASTE MINIMIZATION PLAN**

Site Name : Oil Process Company

EPA ID No. : CAD05806850

SIC : 4959

Address : 5756 Alba Street
Los Angeles, CA 90058

Number of Employees : 42

Oil Process Company is a treatment, storage and transfer facility. It is not a commercial generator of hazardous waste but has developed this waste reduction plan as an effort to minimize or reduce the residuals of our waste water treatment and other waste handling activities. OPC's waste handling residuals are divided into three categories namely: a) spent carbon from waste water treatment, b) sludge from waste water treatment and c) empty containers resulting from lab packing, bulking and blending of hazardous waste. OPC plan calls for reduction of these residuals as follows:

SPENT CARBON

About 1,250lbs of this waste is generated per month at our facility. Our effort calls for recycling this waste for reuse rather than the current practice of sending this waste out for incineration. Efforts are being made to find a carbon regenerating company as exemplified in attachment A. Our projected goal is to find a company that will accept and regenerate this waste for reuse by December 1992. This approach is not only conducive to waste minimization, but it is also more cost effective for us (see time table for implementation of plan.)

<u>Time Frame</u>	<u>Activity</u>
August 1, 1991, thru February 28, 1992 or recycling company.	Continued effort to find a regenerating
March 1, 1992, thru June 30, 1992	Period of business negotiation.
July 1, 1992, thru November 30, 1992	Effort to comply with shipping requirements of regeneration company.
December 1, 1992	Shipment of spent carbon for regeneration begins.

FILTER CAKE (DEWATERED SLUDE)

About 271,668lbs of dewatered sludge have been generated in the first eight months of 1991 so far. Sludge generated during the treatment process is primarily heavy metal precipitate and suspended solids. Sludge is currently disposed off at a hazardous waste landfill.

All improvement to the existing treatment plant would be made in accordance with the best available technology that will be in use on a commercial scale at the time of modification. We propose using liquid chlorine and sulfur dioxide in the redox process. This procedure has been in use commercially for several years in the United States. We project that it will lead to at least 2 percent reduction in sludge production. The time frame for implementation of proposal is 1995 when modification to our treatment facility would have been completed.

EMPTY CONTAINERS

These are left over steel and plastic drums after bulking and blending of hazardous waste liquids. They will be triple rinsed according to federal and state regulations, and transported to a drum reconditioning and recycling company as opposed to current practice of land filling these containers. Efforts are underway to find a recycling company to accept these containers, as exemplified in attachment B. The projected date of implementing this plan is June 1, 1992. Time table for implementation of plan is outlined below.

<u>Time Frame</u>	<u>Activity</u>
September 1st, thru December 31, 1992	Period of business negotiation and search for other reconditioning companies in Southern California.
January 1, 1991 thru May 31, 1992	Effort to comply with shipping requirements of drum reconditioning company.
June 1, 1992	Shipment of drums for reconditioning begins.

REPORT SUMMARY

The following is a summary of processing steps used at Oil Process Company facility to treat industrial waste water.

1. Chromium Reduction
2. Cyanide Oxidation
3. Heavy metal removal by neutralization and chemical precipitation
4. Clarification (Coagulation and flocculation)
5. Sludge Dewatering
6. Activated Carbon Adsorption

Due to the current treatment plant configuration, the treatment chemicals used in the process scenarios are limited to solid and liquid form. The treatment is performed in a batch process and a bench scale test is conducted of each batch to determine optimum chemical dosage so as to obtain treatment criteria and to minimize process sludge production.

It must be mentioned that Oil Process Company was granted a permit to modify this treatment facility in 1990. The primary objective of this modification is to improve operating efficiency and minimize waste.

The following applies to current operating practices:

1. Reduction - Sodium metabisulfite is used in ratio of 2.0 : 1. The use of sulfur dioxide is planned for the modified treatment plant which would result in a reduction in chemical usage but no significant change in sludge production.

2. **Oxidation** - Calcium hypochlorite is used in a ratio of 7.0 : 1 which increases sludge generation by approximately 2%. The use of liquid chlorine is planned for the modified treatment plant which would result in a 2% reduction in sludge in this scenario.
3. **Heavy Metal Removal** - Sodium hydroxide is used for neutralization and sodium sulfide is used for chemical precipitation in place of lime to minimize sludge production.
4. **Clarification** - Ferric Chloride, Aluminum Sulfate, lime or polymer is used depending upon the chemical and physical characteristic of the material contained in the batch to be treated. This is determined by jar testing.
5. **Sludge Dewatering** - No chemical is used.
6. **Adsorption** - Activated carbon is used to reduce organic carbon to discharge criteria levels in the treated water effluent. Spent carbon generation is approximately 15,000lbs/year based on total volume water discharged to the POTW. Currently this carbon is being disposed of by incineration. Attempts are being made to try regeneratin or recyging this carbon.

The monthly average of treated water discharged to the POTW is 82,316 gallons and average carbon usage is 1,250 pounds.

The following steps are being taken to minimize waste at the OPC facility.

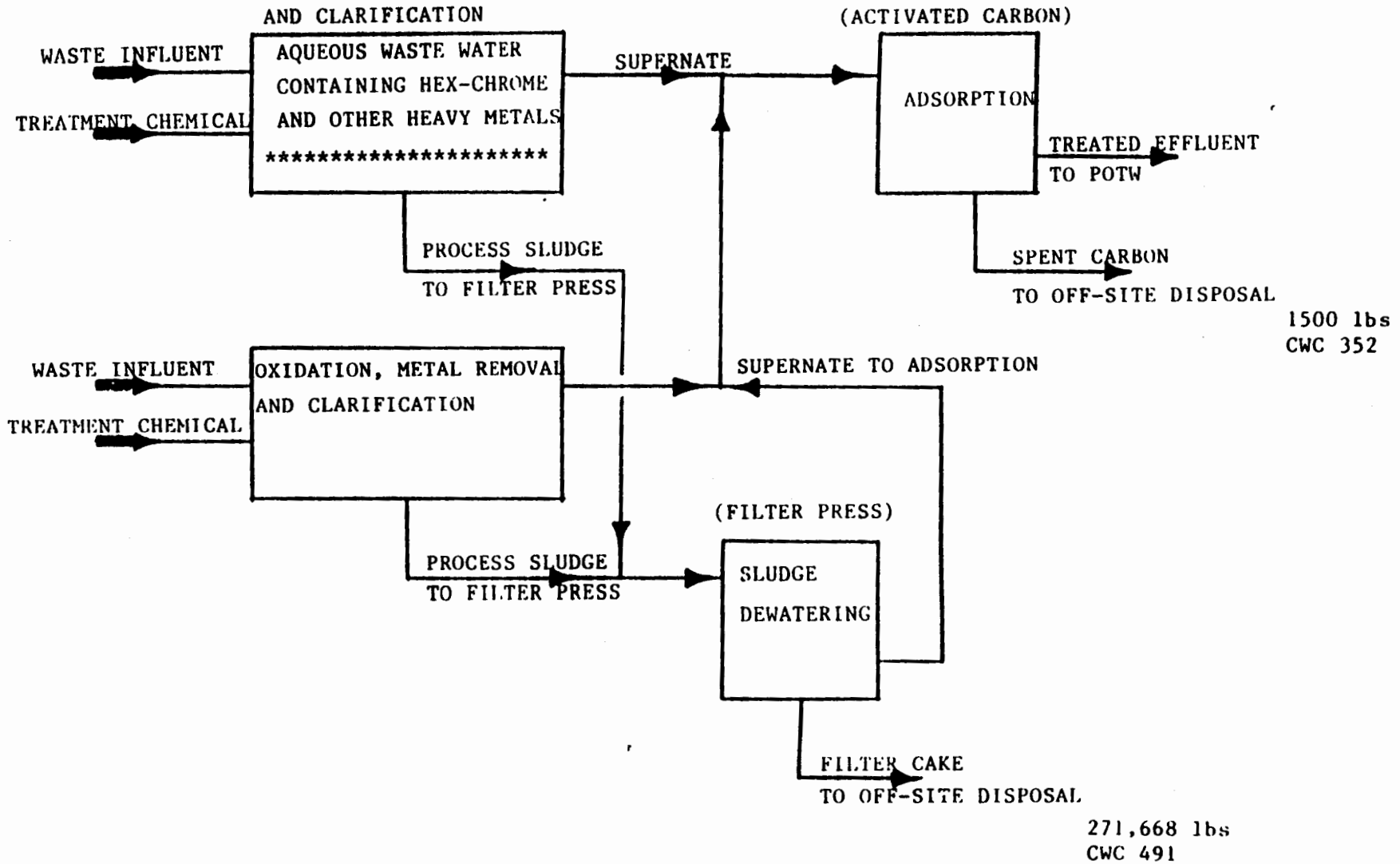
1. Treated water from the treatment plant is being reused for plant area wash down, transport tank and container clean out and dry chemical mixing. This proceeedure reduces consumption of city water supply by approximately 12,000 gallons per month.
2. OPC has installed a cooling water circulation system for use by the on site laboratory. The primary purpose is to supply cooling water to the distillation apparatus. This proceeedure reduces consumption of city water supply by approximately 5,000 gallons per month.

BLOCK FLOW DIAGRAM OF WASTE WATER TREATMENT PROCESS

SITE NAME: OIL
PROCESS COMPANY

YEAR: 1991

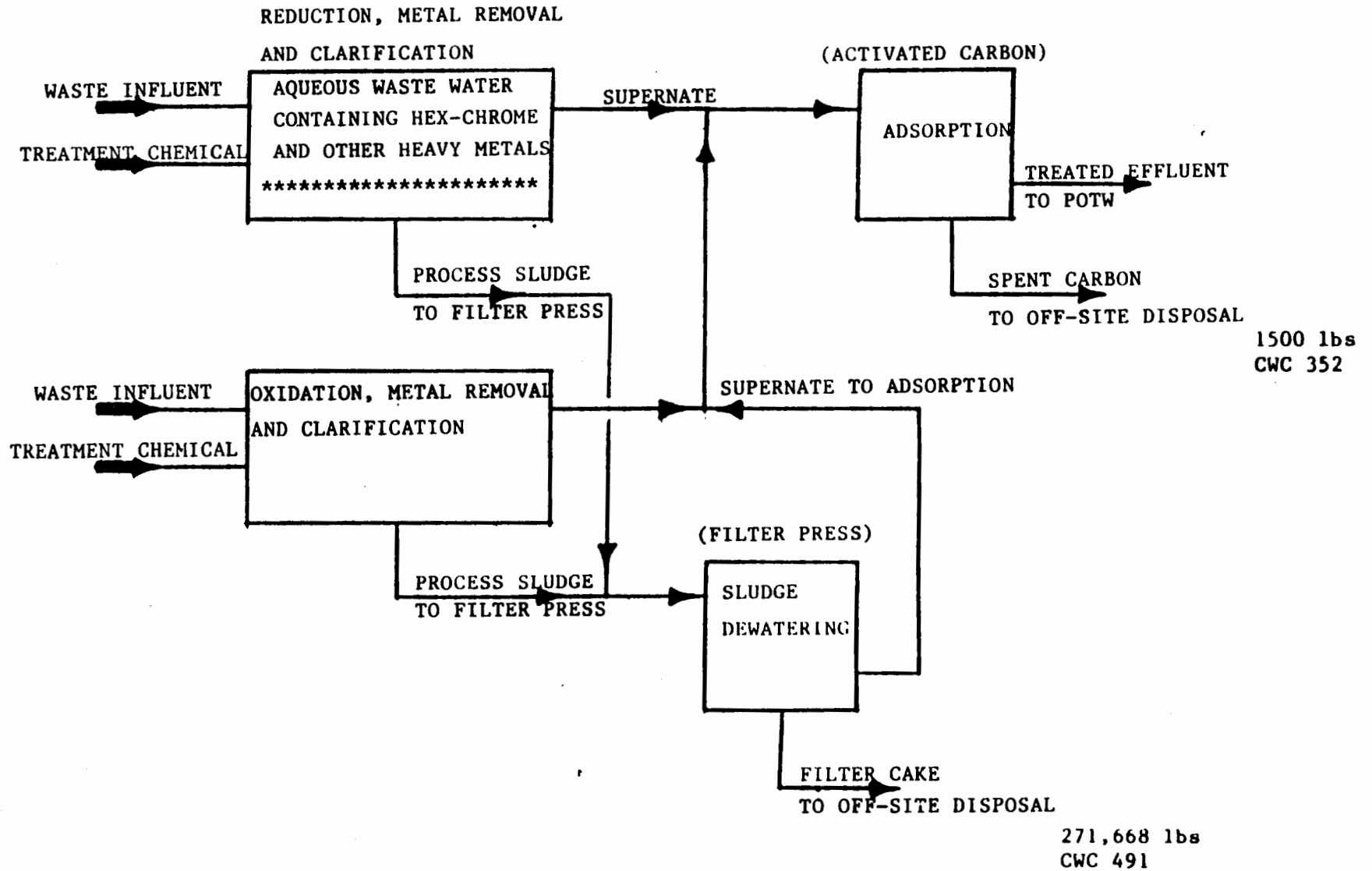
REDUCTION, METAL REMOVAL
AND CLARIFICATION



BLOCK FLOW DIAGRAM OF WASTE WATER TREATMENT PROCESS

SITE NAME: OIL
PROCESS COMPANY

YEAR: 1991



WASTE GENERATION AND MANAGEMENT

Site Name : Oil Process Company

EPA ID No. : CAD050806850

SIC : 4959

Waste Description : Filter cake (Dewatered sludge)

California Waste Code : 491

Base Line Year : 1991

Current Year : 1991

Quantity Generated : 271.668

In 1991 in lbs

ABSTRACT

Waste Minimization (Dewatered Sludge)

Name of Organization : Oil Process Company
Location : Los Angeles, CA
SIC : 4959
Type of Industry : Hazardous Waste Management

MODIFICATION

Substitute sulfur dioxide for sodium metabisulfite in chromium reduction; substitute liquid chlorine for calcium hypochlorite in cyanide oxidation; substitute sodium hydroxide and sodium sulfide for lime in heavy metal removal.

Overview : The current treatment plant configuration and chemicals used in treatment process are limited to solid and liquid form. Treatment is performed in a batch process, and a bench scale test is conducted on each batch to determine optimum chemical dosage so as to obtain treatment criteria, and to minimize process sludge production. Our plan calls for change in chemical formulation and treatment process in order to minimize sludge residue.

Waste Reduction : 5,433lbs
Time to Implement : 4 yrs.
Environmental and Health Benefits : Reduction in hazardous waste load to landfill, thus reducing the potential for soil, air and ground water pollution.

WASTE GENERATION AND MANAGEMENT

Site Name : Oil Process Company

EPA ID NO : CAD050806850

SIC : 4959

Waste Description : Spent Activated Carbon

California Waste Code : 352

Base Line Year : 1991

Current Year : 1991

Quantity Generated : 15,000

In 1991 in lbs.

ABSTRACT

Waste Minimization Measure for Spent Carbon

Name of Organization : Oil Process Company
Location : Los Angeles, CA
SIC : 4959
Type of Industry : Hazardous Waste Management

MODIFICATION

Substitute recycling\regeneration of spent carbon for incineration.

Overview : As a TSTF, OPC uses activated carbon in the final stage of wastewater treatment to polish effluent by removing organic contaminants prior to discharge of effluent to the sewer. Instead of the current practice of incinerating spent (saturated) carbon, we have proposed sending spent carbon for regeneration or recycling for reuse.

Waste Reduction : 15,000lbs per year approximately
Time to Implement : 16 months
Environmental and Health Benefits : Eliminate incineration of spent carbon thus reducing the potential for volatiles from spent carbon to contaminate soil, air and water.

WASTE GENERATION AND MANAGEMENT

Site Name : Oil Process Company

EPA ID No. : CAD0050806850

SIC : 4959

Waste Description : Empty Containers

California Waste Code : 512, 513

Base Line Year : 1991

Current Year : 1991

Quantity Generated : 799, 603

In 1991 In lbs.

ABSTRACT
Waste Minimization (Empty Containers)

Name of Organization : Oil Process Company
Location : Los Angeles, CA
SIC : 4959
Type of Industry : Hazardous Waste Management

MODIFICATION

Substitute reuse of reconditioned plastic and steel drums for landfilling.

OVERVIEW: Most hazardous wastes come into OPC in steel or plastic drums. Some of the wastes are consolidated or lab packed based on compatibility. As a result of waste consolidation, there are left over containers. Current practice is to crush the steel drums, and cut down plastics before they are sent for disposal in a hazardous waste landfill. We are proposing triple rising left over containers and have them reconditioned as reusable products.

Waste Reduction : 799 , 603 lbs per year approximately
Time to Implemetnt : 10 months
Environmental and Health Benefits : Reduction in hazardous waste load to landfills. It promotes recycling and reuse of materials.



October 1, 1991

Scott Simpson
California- Environmental Protection
Agency/Region 3
Department Of Toxic Substances Control
1405 No. San Fernando Blvd. Suite 300
Burbank, Ca 91504

Ref: Oil Process Company
EPA I.D. No. CAD 050806850

Mr. Simpson:

Attached is OPC'S waste minimization plan as required by our hazardous waste facility permit.

Please note that reduction in quantities resulting from these minimization plans have been based on the current amount of waste received at our facility. should the amount of waste received change, we estimate the waste reductions will change as a percentage of the amount currently received.

Some of our waste minimization plans call for use of various treatment chemicals to reduce the waste produced in wastewater treatment. The savings in waste minimization resulting from the use of these chemicals will have to be weighed against the safety issues involved with these chemicals. The final decision will be a result of an overall design/safety review of our plans prior to implementation.

If you have any questions, please do not hesitate to contact me at 213-585-5063.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Reed", with a stylized flourish at the end.

Ron Reed
Vice President and General Manager

cc: Tom Kelley
US-EPA
75 Hawthorn
Mail drop H-3-2
San Francisco, Ca 94105

cc: Jerry Jordan
Maury Hunt
Desmond Phillip
Chris Lilley
Tim Sloan

ATTACHMENT A

Legend 7th Carbon

Page 2
Adsorption Systems, Inc.
JOB #: 1290-5147

REIC SAMPLE #	5147-1		
ASI SAMPLE #	OPC-L-2W	METHOD	MQL
-----mg/kg-----			

TOTAL METALS

arsenic	1.76	7060	0.25
cadmium	24.7	7131	0.025
chromium	11.1	7191	0.125
lead	4.04	7421	0.25
silver	ND	7760	0.25
nickel	37.9	7520	3.75
copper	134	7210	0.10
zinc	135	7950	0.5

REIC SAMPLE #	5147-1		
ASI SAMPLE #	OPC-L-2W	CAS #	MQL
METHOD: CS ₂ DISSOLUTION, GC-MS			
-----mg/kg-----			

acetone	ND	67-64-1	50.0
2-butanone	ND	78-93-3	50.0
methyl chloroform	ND	71-55-6	50.0
1,2-dichloroethene	ND	540-59-0	50.0
ethylbenzene	ND	100-41-4	50.0
methylene chloride	ND	75-09-2	50.0
benzene	ND	71-43-2	50.0
toluene	ND	108-88-3	50.0
tetrachloroethene	ND	127-18-4	50.0
p-xylene	ND	106-42-3	50.0

MQL - Minimum Quantifying Level
ND - None Detected at MQL

DATE 1-11-91

ANALYSTS

Claude Scott
Claude Scott

Ray Erickson
Ray Erickson

ATTACHMENT B



PACIFIC COAST DRUM CO.

dba: Gene's Coopers Co.

2200 North Rosemead Boulevard • South El Monte, California 91733

(213) 283-0218 (818) 443-3096

Pacific Coast Drum Company is a full service drum reconditioner/recycler based in Southern California. We are able to process open top and closed top steel drums and closed top poly drums.

PCD specializes in developing programs for drum users that include the cradle to grave theory. We help you to purchase drums that are the most reconditionable so that when the drum is empty it is an asset rather than a liability. The goal is to get maximum usage from each steel drum.

Our services include empty drum pick-ups in the Southern California area. The drums must meet the criteria of EPA as set by the EPA and the State of California.

PCD also carries a line of new steel drums that range in size from 16 gallon to the 85 gallon salvage drums. PCD follows the specifications of the Department of Transportation for the manufacture of these drums as required.

We also carry accessories for steel drums: weather covers, liners, bung wrenches, gaskets, plugs, rings, and cap seals.

For more information please contact PCD and our sales representative will help customize a drum usage program for your company.



PACIFIC COAST DRUM CO.

dba Gene's Coopers Co.

2200 NO. ROSEMEAD BLVD.
SOUTH EL MONTE, CA 91733

KELLIE S. SIMPSON
V.P. - SALES & MARKETING

CALIFORNIA DRUM TASK FORCE

POST OFFICE BOX 3593
SOUTH EL MONTE, CALIFORNIA 91733

April 24, 1991

Dear California Drum Task Force Member:

On February 28, 1991 the State of California adopted an emergency "Contaminated Containers" Regulation. This regulation establishes specific guidelines for determining when an emptied container must be managed as either a hazardous waste or non-hazardous commodity.

The new regulation will be in effect for at least 180 days and will be promulgated in final form only after the necessary public hearings have been conducted and comments evaluated. This new regulation is "generator" oriented, requiring the generator of empty containers to determine whether or not his empty container can be classified hazardous or non-hazardous. Also, the regulation is more stringent than the federal regulations in defining when a drum is "empty" and capable of being classified non-hazardous.

It is anticipated the new regulation will prompt numerous questions from drum emptiers on understanding and interpreting its provisions. Enclosed with this letter is a handout entitled "Drum Acceptance Policy" that has no official standing, but is meant to serve as an industry guidance document. It is an attempt to assist you and your customers in understanding what is required to get a drum emptied to the point that it can be sent to a reconditioner as a non-hazardous material. Further, this document was developed by the Task Force steering committee with the idea in mind of providing a practical "street" guide to the new regulation. It is by no means deemed complete, and any suggestions you can make would be appreciated.

Once again, please be aware that this new regulation is in effect now, and that the "empty criteria" are more difficult to attain than the federal guidelines.

Sincerely,



DARRYL BARTOLOTTI

President

California Drum Task Force



PACIFIC COAST DRUM CO.

dba *Gene's Cooperage Co.*

2200 North Rosemead Boulevard • South El Monte, California 91733

[213] 283-0218 [818] 443-3096

FAX [818] 443-2925

May 1991

Dear Customer:

Enclosed is a copy of the California Drum Task Force's explanation of the new "California Empty Container Regulation" (Appendix II)

Every attempt has been made to make the regulation clear and simple. PCD realizes there are going to be questions that come up as you start your emptying program and we will have our support staff ready to help you with any problems you may encounter.

These regulations are enforceable now so it is important that your employees understand that if you do not comply with the regulations you are subject to action from the State or County Health Departments. According to the new regulation, it is the generator's responsibility to make sure the drums are empty and prepared for shipment.

There will be public hearings in June. If you are interested in attending, please, let us know so we may forward time and place information to you when it becomes available.

Sincerely,
Pacific Coast Drum Company

Kellie S. Simpson

Kellie S. Simpson
V.P. Sales & Marketing